CITY OF WILLITS

GENERAL PLAN
LAND USE ELEMENT UPDATE
DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT

SCH No. 2023030321

Public Draft

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Prepared for:
City of Willits
111 E. Commercial Street
Willits, CA 95490

Prepared by:

PLANWEST PARTNERS, INC.

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1.0 INTRODUCTION AND SUMMARY

1.1 PROJECT BACKGROUND AND PURPOSE

The Draft Program Environmental Impact Report (PEIR) assesses the potential environmental effects of the adoption and implementation of updates to the City of Willits (City) Land Use Element, including an update to the City Sphere of Influence (SOI), and adoption and implementation of the revised Zoning Code which are all proposed by the City (herein collectively referred to as "Project" or "proposed Project").

This Program EIR has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code (PRC), Section 21000 et seq.) and the *Guidelines from Implementation of CEQA Guidelines* published by the Public Resources Agency of the State of California (California Code of Regulations, Title 14, Section 15000 et seq.).

The PEIR was prepared by professional contact City staff. The City is the lead agency for the preparation of this EIR as defined by the *CEQA Guidelines* (PRC Section 21067 as amended), and the content of the document reflects the independent judgment of the City.

This PEIR is intended to provide information to public agencies, the general public, and decision makers regarding potential environmental impacts related to the three components of the proposed Project:

1) Adoption and implementation of the Land Use Element and SOI Updates

2) Adoption and implementation of the revised Zoning Code

The purpose of an EIR, under provisions of CEQA, is "to identify the significant effects on the environment of the project, to identify the alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." (PRC Section 21002.1[a].)

This PEIR provides a first-tier analysis of the potential environmental effects of the proposed Project. Section 15152 of the CEQA Guidelines indicates that tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site specific EIR or negative declaration if additional analysis is necessary. Subsequent activities in accordance with the proposed Project examined in light of this PEIR to determine whether an additional environmental document must be prepared. If a subsequent project or later activity would have effects that were not examined in this PEIR, or not examined at an appropriate level of detail to be used for the later activity, an initial study would need to be prepared to determine the appropriate environmental document. If the City finds that pursuant to Section 15152 of the CEQA Guidelines, no new effects could occur or new mitigation measures would be required on a subsequent project, the City can approve the activity as being within the scope of the Project covered by this PEIR, and no new environmental document would be required. In addition, the standards related to subsequent EIRs at CEQA Guidelines Section 15162 to 15164 and PRC Section 21166 are applicable to this PEIR.

The City will review subsequent projects for consistency with the PEIR and prepare appropriate environmental documentation pursuant to CEQA provisions for PEIRs and subsequent projects. Subsequent projects under the PEIR may include but are not necessarily limited to the following implementation activities:

- Rezoning of properties

- Approval of Specific Plans
- Approval of development plans, including tentative maps, variances, conditional use permits, and other land use permits
- Approval of development agreements
- Approval of facility and service master plans and financing plans
- Approval and funding of public improvement projects
- Approval of resource management plans
- Issuance of permits and other approval necessary for implementation of the General Plan
- Acquisition of property by purchase
- Annexations into the City

To define the scope of the investigation of the Draft PEIR. The City distributed a Notice of Preparation (NOP) on February 8, 2023, to the State Clearinghouse, State agencies, Cities, and Humboldt County; other public agencies; and interested private organizations and individuals, in accordance with the requirements of the California Code of Regulations, Title 14, Sections 15082(a), 15103, and 15375. Pursuant to Section 15082 of the *CEQA Guidelines,* recipients of the NOP were requested to provide responses within 30 days after their receipt of the NOP. An initial study was not prepared with NOP; *CEQA Guidelines* Section 15063(a) permits a lead agency to omit an initial study if it determines that an EIR is clearly required. The purpose of the NOP was to identify agency and public concerns regarding potential impacts of the proposed Project. The following is a list of the comment letters received during the NOP public comment period, a brief summary of the issues raised, and reference to where the issues are discussed in the EIR. The NOP comment letters are included in Appendix X of the EIR.

- **Native American Heritage Commission, March 13, 2023**
  - Tribal Cultural Resource (Chapter 3, 3.5 Cultural and Tribal Cultural Resources)
  - Tribal Consultation requirements (Chapter 3, 3.5 Cultural and Tribal Cultural Resources)
- **Mendocino Local Agency Formation Commission, April 5, 2023**
  - Identify areas proposed to be included in the proposed SOI (Chapter 2.0 Project Description)
  - Identify service providers within the SOI (Chapter 2.0 Project Description and Chapter 3, Section 3.15 Public Services and Section 3.18 Utilities and Service Systems)
  - Identify potential impacts to Agricultural Resources (Chapter 2.0 Project Description, Chapter 3, Section 3.2 Agricultural and Forestry Resource)
  - Identify Disadvantaged Unincorporated Communities (Chapter 2.0 Project Description and Section 3.11 Land Use and Planning)
- **Department of Fish and Wildlife, April 10, 2023**
  - Riparian, Stream and Wetland Protection Zones and Setbacks (Chapter 2.0 Project Description and Chapter 3, Section 3.4 Biological Resources)
  - Conservation of Oaks and Oak Woodlands (Chapter 2.0 Project Description and Chapter 3, Section 3.4 Biological Resources)
  - Invasive Species Control and Native Plant Landscaping (Chapter 3, Section 3.4 Biological Resources)
- **California Department of Transportation, April 10, 2023**
  - Transportation infrastructure and future road network expansion with the proposed changes in land use and in the siting of proposed housing opportunity commercial zones and connectivity via bicycle and pedestrian facilities ((Chapter 2.0 Project Description and

Chapter 3, Section 3.11 Land Use and Planning and Section 3.17 Transportation Circulation)
- o Infill development and vehicle miles travelled (Chapter 2.0 Project Description and Chapter 3, Section 3.11 Land Use and Planning and Section 3.17 Transportation Circulation)
- o Planning for land uses that generate fewer Vehicle Miles Traveled per capita, fewer Greenhouse Gas emissions Chapter 2.0 Project Description and Chapter 3, Section 3.8 Greenhouse Gas Emissions, Section 3.11 Land Use and Planning and Section 3.17 Transportation Circulation)

1.2 LEGAL BASIS

In 1970, the California Legislature enacted the California Environmental Quality Act (CEQA). The statues that comprise CEQA are set forth in the California Public Resources Code, Section 21000 *et seq.* To assist in implementing these statutes, the State of California has issued regulations known as the State CEQA Guidelines. Under CEQA, all State and local agencies are required to consider the environmental impacts of any project they approve or propose to implement. The principal CEQA mechanism for consideration of the impacts that may have potentially significant environmental impacts is the EIR.

An EIR is primarily a public disclosure and information document with a number of specific objectives, including:

- To inform public agency decision makers and the public of the environmental effects of proposed activities;
- To assist public agency decision makers as they consider the environmental implications of their actions;
- To identify ways in which environmental damage can be avoided or significantly reduced;
- To reduce or prevent damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures; and
- To disclose to the public the reasons why a governmental agency approved a project if significant environmental effects are involved.

CEQA requires the preparation of an EIR prior to approving any “project” that may have a significant effect on the environment. For the purposes of CEQA, the term “project” refers to the whole of an action that has a potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). The City of Willits has determined that implementation of the Draft Land Use Element of the General Plan, along with proposed updates to the SOI and Zoning Code, constitutes a “project” within the definition of the CEQA. Typically, General Plan updates may have the potential for resulting in significant environmental effects. This PEIR was prepared to evaluate the extent to which the proposed revision of the City’s General Plan has the potential for significant environmental impacts.

1.3 TYPE OF DOCUMENT AND INTENDED USE

In accordance with CEQA Guidelines Section 15146, the degree of specificity of this EIR corresponds with the degree of specificity involved in the underlying activity; i.e., adoption of updates to certain elements of the City of Willits’s General Plan and Zoning Code along with related implementation. Since the proposed General Plan revision is "general" in nature and proposes few policies and actions that would have substantial physical changes in land use and related impacts greater than policies that are already in effect, this EIR is necessarily less detailed than an EIR would be for a site-specific construction

project or similar activity. This EIR addresses environmental issues on a broader scale. In addition, the major policy emphasis of the proposed General Plan revisions is to reaffirm and reinforce the general intent of existing policies. Therefore, this EIR is intentionally direct and concise, as opposed to speculative and exhaustive.

An evaluation of the environmental impacts of a general plan revision is much different than an assessment of the potential impacts that may result from a proposed project that directly involves physical changes to land, as would be the case with a subdivision project or a use permit for a particular land use. As the name implies, a general plan consists of general policies concerning land use, public services and infrastructure, and resource management. Therefore, a general plan revision itself may not have specific environmental impacts. This factor is very much the case with the proposed updates to the City's General Plan, SOI, and Zoning Code.

A second factor, in the case of a general plan revision, is that the City already has a general plan and zoning code in place. As is discussed in the "No Project" alternative, if the City does not revise its General Plan and zoning code at this time, it will still have these documents in place with all of the land use designations, goals and policies that are currently in effect.

Upon approval of the project by the City and certification of this PEIR, additional CEQA compliance including negative declarations, mitigated negative declarations, or the preparation of project level EIRs will be required for development projects that may be proposed within the City's jurisdiction.

1.4 SCOPE OF THE PEIR

In accordance with PRC Section 21002.1, the purpose of this EIR is to address the potential environmental impacts resulting from the construction and operation of the proposed Project, proposed mitigation measures to reduce potentially significant environmental impacts, and identify and evaluate alternatives, which could reduce or avoid the significant effects of the proposed Project. While the Project components include "paper" projects, meaning that the Land Use Element, SOI, and Zoning Code updates are policy documents that do not have direct physical impacts to the land, most of the analysis in this PEIR will be addressing when applicable, the foreseeable physical impacts of implementing the General Plan, as this document creates the blueprint of future development in the City. The other aspects of the Project are analyzed as appropriate within each issue area. The EIR process provides an opportunity for the public to review and comment upon the potential environmental impacts of the proposed Project.

The City Council, who also sits as the Planning Commission, is the decision-making body with authority to take action on the Project. The City Council will consider the information in this PEIR as part of their evaluation of the proposed Project. The findings and conclusions presented in the PEIR regarding environmental impacts do not control the City's discretion to approve, deny, or modify the Project, but instead are presented as information to aid the decision-making process.

As set forth in Section 15021 of the CEQA Guidelines, as lead agency, the City has the duty to avoid or minimize environmental damage where feasible. Furthermore, Section 15021(d) of the CEQA Guidelines states that, "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors, and in particular the goal of providing a decent home and satisfying living environment for every Californian." In accordance with CEQA, the City will be required to make findings for each environmental impact of the proposed Project that cannot be mitigated to below a level of significance. If the City determines that the benefits of the proposed Project outweigh unmitigated

significant environmental effects, the City will be required to adopt a statement of overriding considerations stating the reasons supporting their action notwithstanding the proposed Project's significant environmental effects.

1.5 Environmental Review Process

The review and approval process for the PEIR and the Project will involve the following procedural steps:

Notice of Preparation (NOP): The NOP was completed and distributed to the State Clearinghouse on March 10, 2023, and assigned SCH Number 2023030321.

Notice of Completion (NOC): The City will file a NOC with the State Office of Planning and Research to begin the required public review period (per Public Resources code, Section 21161).

Public Notice/ Public Review: Concurrent with the NOC, the City will provide public notice of the availability of the EIR for public review and invites comment from the general public, agencies, organizations, and other interested parties. The public review and comment period for a PEIR should be no less than 30 days and no more than 90 days. The review period in this case will be 45 days. Public comment on the PEIR will be accepted both in written form and orally at public hearings. The City Council will hold a public hearing during the review period to receive further public input on the draft document. Notice of the time and location of the hearing will be published prior to the hearing. All comments or questions regarding the PEIR should be addressed to:

Dusty Duley, Community Development Director
City of Willits
111 E. Commercial Street
Willits, CA 95490
dduley@cityofwillits.org
Phone: (707) 459-4601

Response to Comments/ FPEIR: Following the public review period, a Final PEIR (FPEIR) will be prepared. The FPEIR will respond to written comments received during the public review period and to oral comments concerning the Draft PEIR made at the public hearing in which the PEIR is considered. These two documents, the Draft PEIR and the FPEIR, represent the completed PEIR for this project. The FPEIR will be available for public review prior to its consideration for specific approvals by the City Council. The City Council will review and consider the FPEIR prior to its decision to approve, revise or reject the proposed project.

Project Consideration: Upon review and consideration of the complete PEIR, the City may act upon the project. A decision to approve the project would be accompanied by written findings in accordance with CEQA Guidelines Section 15091 and, if applicable, Section 15093. The City would also adopt a monitoring and reporting program for any mitigation measures that have been incorporated into or imposed upon the project to reduce or avoid significant effects on the environment.

Certification of the PEIR: If the City finds that the PEIR is "adequate and complete", the City may certify the PEIR. The rule of adequacy generally holds that he PEIR can be certified if: 1) it shows a good faith effort at full disclosure of environmental information, and 2) provides sufficient analysis to allow decisions to be made regarding the project in contemplation of environmental considerations.

1.6 Mitigation Monitoring

CEQA requires that, when a public agency makes findings based on a PEIR, that agency must adopt a reporting and monitoring plan for any included mitigation measures or make them a condition of the project approval. Mitigation measures are actions taken in addition to adopted plans, polices, and codes that already regulate the project. A reporting and monitoring plan, if needed, will be designed to ensure compliance during project implementation and provide disclosure to the public to ensure that conditions are monitored and properly met (Public Resources Code Section 21081.6).

1.7 Summary of Impacts and Mitigation Measures

Table 1-1 identifies, by impact topic, the significant Project impacts, proposed mitigation measures, and post-mitigation significance. Additional information about the impacts and mitigation measures can be found in Chapter 3.

Table 1-1: Summary of Impacts, Mitigations, and Significance Levels

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
3.1 Aesthetics			
Threshold AES-01: *Would the project have a substantial adverse effect on a scenic vista?* The proposed Land Use Element could change the intensity of development, potentially affecting scenic vistas from viewpoints within Willits and the Planning Area, allowing higher density residential development that may affect views of wooded hillslopes and rangeland, riparian corridors, and mature trees. With the addition of a new policy requiring that homes and roads on hillsides be clustered or sited and designed to preserve scenic character and that grading be minimized, the adoption of the Land Use Element Update into the General Plan, adverse effects of Project are less than significant.	Significant	**AES-1 - New Policy** **LU-9.X. Development in Hillside Areas**. Require new development in hillside areas be sited and designed to retain the natural hillside setting by minimizing grading and other major disruptions of the natural slope areas. The City shall encourage clustered dwelling units in hillside areas to preserve the scenic character of the hillsides.	Less than Significant
Threshold AES-02: *Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?* There are no officially listed State Scenic Highways within the Project Area. However, a segment of S.R. 20 and a segment of U.S. 101 within the Project Area have been identified by Caltrans as eligible for potential listing. If the two eligible sections of S.R. 20 and U.S. 101 were to become designated State Scenic Highways, policies and programs under the Land Use Element would not damage the scenic resources that contributed to their listing as a State Scenic Highway.	No Impact	None required	No Impact

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Threshold AES-03: *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?* The Land Use Element adds Zoning performance standards relating to design and would not conflict with City regulations governing scenic quality in urban areas. However, the existing Conservation and Open Space Element Policy and proposed Land Use Element Update may not adequately protect the visual character of the hillslopes in SOI areas such as the State Route 20 SOI area. Therefore, this impact would be potentially significant, and Mitigation Measure AES-1 would be required to minimize adverse effects to the visual character or quality of public views of the site and its surroundings.	Significant	**AES-1 - New Policy LU-9.X. Development in Hillside Areas**.	Less than Significant
Threshold AES-04: *Would create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?* Policies and measures of the proposed Land Use Element promote infill and compatible development to minimize light or glare related impacts of new development. Although development allowed by the Project would temporarily and permanently introduce new sources of light and glare, through the implementation of Land Use Element policy and consistent Zoning amendments regulating lighting and glared for new development, impacts would be less than significant.	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
3.2 Agricultural and Forestry Resource			
Threshold AG-01 – *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?* The Planning Area does not contain mapped Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. DOC Farmland Mapping and Monitoring Program maps show Grazing Land, Other Land, and Urban and Built-Up Land within the Planning Area and do not show any Important Farmland categories within the Planning Area. As such, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.	No Impact	None required	No Impact
Threshold AG-02: *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?* Implementation of the project would apply non-agricultural land use designations to 18.9 acres of land planned and zoned for agricultural use by Mendocino County within the proposed annexation areas; however, only a small portion of developed parcels may contain agricultural activities and the proposed land use designations are intended to reflect the current use of the property. With proper implementation of the Land Use Elements and planning prior to possible annexation of SOI, impacts would be less than significant.	Potentially Significant	**AG-01: Proposed New Policy: Annexation Planning.** **New Policy LU-2.X.** Discourage urban development within the City's Sphere of Influence until such lands are annexed by the City and support County land use regulations that protect the viability of local agriculture in the Little Lake Valley. When considering proposals for annexation, protect designated open space land and existing agricultural activities.	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Threshold AG-03: *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?* There are no existing areas zoned as timberland or timberland production zones within the Planning Area, so therefore no impacts are expected to occur from implementation of the project.	No Impact	None required	No Impact
Threshold AG-04: *Would the project result in the loss of forest land or conversion of forest land to non-forest use?* There are no forest lands involved in the Planning Area, so no impacts would occur from implementation of the project.	No Impact	None required	No Impact
Threshold AG-05*: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?* There are likely agricultural activities within portions of the proposed SOI and prime agricultural soils. Land Use Element could result in the conversion of prime agricultural land, as defined by LAFCo, to a non-agricultural use. Land Use Element policy may not be adequate to ensure that the potential for the conversion of Farmland to a non-agricultural use is less than significant	Potentially Significant	**AG-01: Proposed New Policy: Annexation Planning**	Less than Significant
3.1 Aesthetics			

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Threshold AQ-01: *Would the Project conflict with or obstruct implementation of the applicable air quality plan?* The proposed Project would be consistent with MCAQMD's Particulate Matter Attainment Plan and rules and regulations. Impacts would be less than significant.	Less than Significant	None required	Less than Significant
Threshold AQ-02: *Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region in in non-attainment under an applicable federal or state ambient air quality standard?* The proposed Project and development facilitated by the proposed Project would not result in a cumulatively considerable net increase of PM10. New development would be required to comply with the MCAQMD's Attainment Plan (2005) and rules and regulations and would be required to obtain applicable permits from the MCAQMD. As such, a less than significant impact would occur.	Less than Significant	None required	Less than Significant
Threshold AQ-03: *Would the Project expose sensitive receptors to substantial pollutant concentrations?* The proposed Project and construction and development activities facilitated by the proposed Project could expose sensitive receptors to substantial pollutant concentrations. However, future development would be required to comply with the MCAQMD's rules and regulations (2011) and Attainment Plan (2005). Therefore, impacts would be less than significant.	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
***Threshold AQ-04**: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?* The proposed Project would involve new agricultural and industrial land use designations that may indirectly introduce uses that create objectionable odors. Land Use Element policies and Implementations would ensure that new development and land uses are compatible with surrounding uses. As such, incompatible land uses creating objectionable odors would not be located to where they would adversely impact a substantial number of people.	Less than Significant	None required	Less than Significant
3.4 Biological Resources			
***Threshold BIO-01:** Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?* Future development facilitated by the Project does have the potential to result in direct, indirect, and/or cumulative adverse impacts to special status and/or otherwise protected fish, wildlife, and/or botanical taxa within the incorporated City limits, the proposed expanded Sphere of Influence. Although the existing and proposed regulations and policies described above would likely reduce potential impacts to special status fish, wildlife, and/or botanical taxa identified herein, additional mitigation would also be necessary to further reduce the likelihood for potential development-related impacts	Potentially Significant	**BIO-01.1. Utilize Biological Resource Inventory Assessment Tools During Project Review** **Policy LU-9.X1** The City shall ensure that the best available biological resource mapping data is used during the ministerial and discretionary project review process to identify biological resource concerns, evaluate project alternatives, and guide mitigation to avoid or reduce biological resource impacts to insignificant levels consistent with CEQA. At a minimum, the following biological resource mapping data sources shall be used for project evaluation: California Department of Fish and Wildlife's California Natural Diversity Database (CNDDB) and their Biogeographic Information and Observation System (BIOS), EcoAtlas and the California Aquatic Resource Inventory	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
to protected biological organisms identified in this analysis to a level that would be less than significant.		(CARI), and U.S Fish and Wildlife Service's National Wetland Inventory (NWI). **BIO-01.2. Require Pre-Project Biological Resource Assessments and Surveys** **Policy LU-9.X2** The City shall require site- and/or project-specific biological resource assessments: 1) prior to annexing any properties into the City from the Proposed Sphere of Influence additions, and 2) prior to approval of principally permitted development of multifamily housing on properties planned Residential-Medium Density in the South Haehl Creek area. Biological resource assessments shall address potential impacts to special status and/or otherwise protected fish, wildlife, and botanical taxa (including potential interferences with their movement, migration, and/or dispersal); sensitive natural communities; and wetland habitats. Biological resource assessments shall also identify mitigation measures to avoid and/or reduce impacts to protected biological resources to less than significant levels from all new development allowed within the study area by the General Plan. Where biological resource assessments identify potentially suitable habitat for special status fish, wildlife, and/or botanical taxa; nesting bird or roosting bat habitat; sensitive natural communities; and/or wetlands or other state- or federally regulated waters within respective study areas, appropriate pre-project	

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
		biological surveys or habitat delineations shall also be required. All biological resource assessments, surveys, and delineations shall be performed in coordination with CDFW by qualified professionals with demonstrated familiarity and experience within the region and consistent with respective current field survey protocols. **BIO-01.3. Revise LU-9.3, Riparian Area Land Use Overlay, as follows to Define Riparian Buffer Area Metrics, Facilitate Landscape Permeability, Reduce Stormwater-Related Impacts, and Require Use of Appropriate Plant Species in Revegetation and Landscaping Efforts** **Revise Policy LU-9.3, Riparian Area Land Use Overlay.** Apply an overlay to the Land Use Map, consistent with Conservation and Open Space Element Implementation Measure 3.320 identifying streams and wetlands within the City to be protected from development. Prohibit development within a buffer area on both sides of streams subject to the following criteria: (a) A combining zone for stream and riparian areas shall also be established and applied to parcels adjacent to streams and subject to the Riparian Area Land Use Overlay that specifies protective criteria consistent with this policy.	

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		(b) Riparian Buffer Areas associated with streams shall be established on both sides of streams and shall be measured from either the outer drip-line of riparian vegetation or the top-of-bank, whichever is furthest from the stream centerline, and shall extend horizontally for a distance of: • **100 feet for perennial streams, or** • **50 feet for intermittent streams.** **Riparian Buffer Areas associated with wetlands shall extend horizontally from the delineated wetland boundary for a distance of:** • **150 feet for perennial wetlands, or** • **50 feet for seasonal wetlands.** (~~b~~**c**) Buffers may be reduced or eliminated where the City determines, based on factual findings and in consultation with CDFW, that the reduction will not result in significant adverse effects to the water quality, dependent biological resources, or ecological functional capacity	

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
		of the aquatic resource of interest. (~~c~~**d**) For ministerial projects that are located on land planned R-L, C-G, GM-U, DM-U containing occupied structures or on vacant parcels that are substantially surrounded by developed parcels where improvements are located within the buffer area, exceptions to these standards may be allowed after a site evaluation has been conducted by City staff and factual findings are made that development is sited to minimize potential impacts to streams, wetlands, and associated riparian resources; does not involve the removal of native riparian vegetation; and the incorporation of performance standards relating to the revegetation of locally-appropriate riparian species and the implementation of best management practices for erosion control. (~~d~~**e**) When the prescribed buffer prohibits development of the site for the primary use for which it is designated, measures shall be applied that allow development that results in the least	

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
		environmentally damaging feasible project. (~~e~~**f**) Road, bridge, and trail construction or replacement may be permitted that would not result in significant adverse effects to water quality, dependent biological resources, or ecological functional capacity of the aquatic resource of interest, where vegetative clearing is kept to a minimum, and where revegetated with locally-appropriate native riparian species. (g) **The installation or replacement of new or existing fencing contiguous with Riparian Buffer Areas shall require the use of wildlife-permeable materials and designs to reduce the likelihood of wildlife entrapment and otherwise facilitate wildlife movement.** **(h) All projects shall implement stormwater requirements from the Mendocino County Low Impact Development Standards Manual to protect water quality and associated aquatic habitats, avoid the use of noxious weeds or other invasive plants identified by**	

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
		the California Invasive Plant Council (Cal-IPC) in associated revegetation and landscaping efforts, and prioritize use of locally-appropriate native vegetation during any such revegetation. (~~f~~**i**) The removal of vegetation for disease control or public safety purposes may be approved, in consultation with CDFW.) (~~g~~**j**) An exception to the implementation of regulations for this policy shall be included for "minor additions" to buildings or structures provided the aggregated total increase in square footage for all changes does not exceed thee hundred (300) square feet of floor area. **BIO-01.4. Require Low Impact Development (LID) Stormwater Design Standards and Use of Appropriate Plant Species in LID and Other Development-Related Landscaping and Revegetation Efforts** **New Policy for "Protect Natural Resources within Areas Planned for Development" Group:** **Policy LU-9.X3** To reduce stormwater impacts to streams and wetlands and improve water quality associated with discretionary development and all development within 250	

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
		feet of Willits, Broaddus or Baechtel Creeks and their tributaries, the City shall implement stormwater requirements from the Mendocino County Low Impact Development Standards Manual to attenuate runoff, reduce scouring and erosion, promote on-site infiltration, and to protect water quality and associated aquatic habitats. **New Policy for "Protect Natural Resources within Areas Planned for Development" Group:** **Policy LU-9.X4** The City shall develop and make available a list of locally appropriate native vegetation suitable for planting within low impact development features and for development-related landscaping and revegetation. The City shall encourage the use of locally appropriate and locally sourced native vegetation for use in revegetation and landscaping efforts as well as encourage the planting of native milkweed (*Asclepias* spp.) species (i.e., the sole plant group within the Planning Area region suitable for egg laying and larval development for the federal candidate species, Western Monarch butterfly [*Danaus plexippus plexippus*]). Where rapid plant establishment and development is required for purposes of soil stabilization and to minimize erosion potential, the City shall encourage the use of sterile hybrid "wheatgrass" x "wheat" (*Elymus* x *Triticum*) or other similar non-reproductive seed material in	

		conjunction with otherwise appropriately-selected revegetation seed applications or blends. In all low impact development infrastructure and other development-related landscaping and revegetation, the City shall prohibit the use of any plant species designated as: "invasive" by the California Invasive Plant Council (Cal-IPC), a "noxious weed" by the California Department of Food & Agriculture (CDFA), or a "federal noxious weed" by the U.S. Department of Agriculture (USDA), as well as any other plants that the City has determined warrant concern based on a known potential for preventing the establishment of the intended vegetation assemblage within respective revegetation areas. **BIO-01.5. Require Appropriate Design Standards to Minimize Artificial Light Pollution** **New Policy for "Protect Natural Resources within Areas Planned for Development" Group:** **Policy LU-9.X5** The design and location of all outdoor lighting fixtures shall prevent direct illumination of streams, wetlands, and Riparian Buffer Areas. **BIO-01.6. Initiate Community Outreach to Reduce Impacts to Wildlife from Pesticide-Related Poisonings and Free-Ranging House Cats.**	

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
		New Policy for "Protect Natural Resources within Areas Planned for Development" Group: **Policy LU-9.X6** Partner with local organizations to educate applicants and residents about the impacts to special status and otherwise protected wildlife from toxic pest control methods, and to discourage their use within the City; as well as to educate the community about the impacts of free-ranging house cats on special status and otherwise protected wildlife.	
Threshold BIO-02: *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?* Development facilitated by the Project does have the potential to result in direct, indirect, and/or cumulative adverse impacts to riparian habitats associated with the various tributary streams of the Outlet Creek watershed and other sensitive natural communities (e.g., *Quercus lobata* Woodland Alliance [Valley Oak Woodland and Forest], etc.) within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas. Although the existing and proposed regulations and policies would likely reduce potential impacts to state- and/or federally regulated wetlands and/or waters, additional mitigation would	Potentially Significant	Refer to Mitigation Measure BIO-01.1. Refer to Mitigation Measure BIO-01.2. Refer to Mitigation Measure BIO-01.3. Refer to Mitigation Measure BIO-01.4.	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
be necessary to further reduce the likelihood for potential development-related impacts to such aquatic resources to a level that would be less than significant.			
Threshold BIO-03: *Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?* Development facilitated by the Project does have the potential to result in direct, indirect, and/or cumulative adverse impacts to state- and/or federally regulated wetlands and/or waters within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas. Although the existing and proposed regulations and policies described above would likely reduce potential impacts to state- and/or federally regulated wetlands and/or waters, additional mitigation would be necessary to further reduce the likelihood for potential development-related impacts to such aquatic resources to a level that would be less than significant.	Potentially Significant	Refer to Mitigation Measure BIO-01.1. Refer to Mitigation Measure BIO-01.2. Refer to Mitigation Measure BIO-01.3. Refer to Mitigation Measure BIO-01.4.	Less than Significant
Threshold BIO-04: *Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?* Development consistent with the Project does have the potential to interfere with the movements and	Potentially Significant	Refer to Mitigation Measure BIO-01.3. Refer to Mitigation Measure BIO-01.5.	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
migration of native wildlife within the proposed expanded Sphere of Influence, and to a lesser extent, within the existing incorporated City limits. Although the existing and proposed regulations and policies described above would likely reduce potential development-related interferences in the movement or migration of native wildlife and/or their use of native wildlife nursery sites, additional mitigation would be necessary to further reduce or potential development-related impacts to a level that would be less than significant.			
Threshold BIO-05: *Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?* The proposed Project is an update to the City of Willits' Land Use Element policy, Land Use Maps, and planning related to proposed land use changes within the City and the proposed expansion of the City's Sphere of Influence to expand land supply available for residential and employment-related development. Implementation of the proposed Project would be consistent with, or improve upon, local policies and ordinances protecting biological resources and would therefore not conflict with Local Policies or Ordinances Protecting Biological Resources.	Less than Significant	None required	Less than Significant
Threshold BIO-06: *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
There are no adopted habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans within the Planning Area. Therefore, implementation of the proposed Project would not conflict with any known conservation plans and no mitigation measures would be required			
3.5 Cultural and Tribal Cultural Resources			
Threshold CUL-01*: Would the Project cause a substantial adverse change in the significance of a historic resource as defined by CEQA Guidelines Section 15064.5?* There are several prehistoric sites noted in the vicinity of the City of Willits. The ethnographic village of Mitoma is noted to be located in the southwestern portion of the City of Willits. In addition, prehistoric cultural resources are likely to be found at the base of hills and along seasonal and perennial water courses. Through compliance with existing regulations related to historical resources and implementation of the proposed policies and programs, the Project would not cause a substantial adverse change in the significance of a historical resource and impacts would be less than significant	Less than Significant	None required	Less than Significant
Threshold CUL-02: *Would the Project ca*use a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5*?* Historical and pre-contact archaeological resources that meet the definition of archaeological resources under CEQA could be damaged or destroyed by ground-disturbing activities associated with future	Potentially Significant	**CUL-1. Cultural Resource Discovery Protocols** **New Implementation Measure for "Coordinate with Local Communities" Group:** **Implementation Measure LU-7.X1:** In the event archaeological resources or cultural	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
development allowed under the proposed Project. there is the possibility that archaeological resource or human remains could be inadvertently discovered due to the ground-disturbing activities required during project construction. By including Mitigation Measure CUL-1, the project necessitates the contractor to adhere to a standard protocol throughout the construction phase. A less than significant impact would occur with mitigation incorporated.		resources, including human remains, are inadvertently unearthed or discovered during construction, the contractor shall immediately halt all grading/land-clearing activities and contact the City of Willits Community Development Department (CDD). All activity in the vicinity of the resources shall cease until it can be evaluated by a qualified archaeologist and a Native American representative. If the archaeologist and Native American representative determine that the resources may be significant, they shall notify the CDD and develop an appropriate treatment plan for the resources. The archaeologist shall consult with Native American representatives in determining appropriate treatment for prehistoric or Native American cultural resources. In considering suggested mitigation proposed by the archaeologist and Native American representative, the CDD will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed in other parts of the project area while mitigation for cultural resources is being carried out.	
Threshold CUL-03: *Would the Project c*ause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA Guidelines Section 21074*?*	Potentially Significant	**CUL-1. Cultural Resource Discovery Protocols**	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Future construction projects within the Planning Area could have the potential to disturb or destroy buried Native American human remains as well as other human remains, including those interred outside of formal cemeteries		**New Implementation Measure for "Coordinate with Local Communities" Group:** **Implementation Measure LU-7.X1:**	
Threshold TCR-01: *Development facilitated by the Project has the potential to cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); and/or resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.* Prehistoric archaeological sites and isolates are TCRs; additionally, plants and other natural resources, as well as geographic locations can also be tribal cultural resources. Grading of original in situ soils could expose buried TCRs and features including sacred sites. While the Project does not directly propose site specific development with the	Potentially Significant	**TCR-1. Avoid Impacts to Tribal Cultural Resources** **New Implementation Measure for "Coordinate with Local Communities" Group:** **Implementation Measure LU-7.X2:** When feasible, development facilitated by the project shall be designed to avoid known tribal cultural resources. Known tribal cultural resources within 60 feet of planned construction activities shall be protected by establishing an Environmentally Sensitive Area (ESA) that would be fenced, or otherwise protected, to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the City of Willits and applicants in consultation with local California Native American tribe(s). **TCR-2. Inadvertent Discovery of Tribal Cultural Resources**	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
potential to directly impact a tribal cultural resource, future development facilitated by the Project could cause a substantial adverse change in the significance of a tribal cultural resource. This is considered a potentially significant impact.		**New Implementation Measure for "Coordinate with Local Communities" Group:** **Implementation Measure LU-7.X3:** If previously unidentified tribal cultural resources are encountered during project implementation, altering the materials and their stratigraphic context shall be avoided and work shall halt immediately. Project personnel shall not collect, move, or disturb cultural resources. A representative from a locally-affiliated Native American Tribe shall be contacted to evaluate the resource and prepare a tribal cultural resources plan identifying methods necessary to protect the resource, in consultation with the City of Willits.	
Threshold TCR-02*: Implementation of the proposed project would not result in a cumulatively considerable impact to cultural and tribal cultural resources.* The impacts of potential future development under implementation of the Projects on cultural resources and TCRs tend to be site-specific, and cumulative impacts would occur when a series of actions leads to the loss of a substantial type of site, building, or resource. Impacts to historical resources, archaeological resources, human remains, or TCRs identified within the areas of potential development in the Planning Area would be less than significant, due to compliance with existing federal, state, and local regulations, goals and policies proposed under	Potentially Significant	**TCR-1. Avoid Impacts to Tribal Cultural Resources** **New Implementation Measure for "Coordinate with Local Communities" Group:** **Implementation Measure LU-7.X2:** **TCR-2. Inadvertent Discovery of Tribal Cultural Resources** **New Implementation Measure for "Coordinate with Local Communities" Group:**	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
the Project and described throughout this section, and identified mitigation measures.		**Implementation Measure LU-7.X3:**	
3.6 Energy			
Threshold EN-01*: Would the project r*esult in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation, or New development under the Project is expected to occur closer to the substation than under current conditions because the proposed Land Use Element and Sphere of Influence changes create more opportunities for new development closer to the substation compared to existing conditions. In this way the Project minimizes the loss of electricity serving the new development in the Planning Area resulting in a beneficial impact on electrical energy use. The proposed project will result in development that has more efficient, and less wasteful energy use during construction and operation, resulting in a beneficial impact.	Less than Significant	None required	Less than Significant
Threshold EN-02: *Would the project* conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The City of Willits does not currently have a locally adopted plan addressing renewable energy and energy efficiency. The proposed project will result in development that will not disrupt baseline renewable energy facilities or services or interfere with the implementation of planned improvements, resulting in a less than significant impact.	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
3.7 Geology and Soils			
Threshold GEO-01: *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of known fault; ii) Strong seismic ground shaking; iii) Seismic-related ground failure, including liquefaction; or iv) landslides?* Development activities facilitated by the implementation of the proposed Project may place structures in areas with seismic sensitivity. Willits, as with much of California, is subject to ground shaking and potential secondary hazards (i.e., liquefaction and subsidence) as a result of earthquakes. Implementation of existing General Plan Safety Element policies and implementations as well as compliance with the UBC and CBC, would reduce potential impacts from seismic activities. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts.	Potentially Significant	**GEO-1: Adopt Draft Safety Element** Prior to, or within six months following, the adoption of the Land Use Element, the City of Willits shall complete the process of updating and adopting the Draft Safety Element consistent with state law and initiate the process of putting into effect the implementation program.	Less than Significant
Threshold GEO-02 *Would the Project result in substantial soil erosion or the loss of topsoil?* Subsequent land use activities associated with the implementation of the proposed Project may result in the potential improvements to existing roadways, construction of infrastructure (water and sanitary sewer facilities), and additional commercial, residential, and industrial development. The grading and site preparation activities associated with such	Potentially Significant	**GEO-1: Adopt Draft Safety Element**	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
activities would remove topsoil, disturbing and potentially exposing the underlying soils to erosion from a variety of sources, including wind and water. In addition, construction activities may involve the use of water, which may further erode the topsoil as the water moves across the ground. The implementation of the policies and actions in the General Plan, as well as applicable state and local requirements, would lessen impacts associated with erosion and loss of topsoil. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts.			
Threshold GEO-03: *Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?* Unstable geologic units could be present within the Planning Area. As future development and infrastructure projects are considered by the City, each project would be evaluated for conformance with the CBSC, the General Plan (1992), the Safety Element (2019), and other relevant regulations. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts.	Potentially Significant	**GEO-1: Adopt Draft Safety Element**	Less than Significant
Threshold GEO-04*: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?* soils in the Planning Area soils vary from a low shrink-swell potential to a high shrink-swell	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
potential. The majority of the Planning Area is depicted as not rated or not available in areas where development has already occurred, reflecting the urbanized areas of Willits. Design criteria and specifications set forth in the design-level geotechnical investigation would ensure impacts from expansive soils are minimized.			
Threshold GEO-05: *Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?* New development facilitated by the Project would not require the use of new septic tanks or alternative wastewater disposal systems.	Less than Significant	None required	Less than Significant
Threshold GEO-06: *Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?* The existing General Plan (1992) and Mendocino County General Plan Draft EIR (2008) do not identify the presence of paleontological or unique geological features within the City or surrounding area. The Mendocino County Draft EIR (2008) identified 182 paleontological resources in Mendocino, the majority of which were found in the Coastal Zone. Regardless, due to the prevalence of paleontological resources in the subsurface, it is possible that future development activities facilitated by the Project could uncover previously unknown paleontological resources.	Potentially Significant	**GEO-2: Other Paleontological or Geological Resource Discover Protocols** **Implementation Measure LU-7.X4** If fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), the City and its contractor shall divert construction activities away from the discovery within 50 feet of the find, and a professional paleontologist shall be contracted to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
		paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they would be properly curated and preserved.	
3.8 Greenhouse Gas Emissions			
Threshold GHG-01: *Would the Project's GHG emissions analysis considers how the potential land use and policy changes of the proposed project will influence overall GHG emissions in the city?* CEQA requires public agencies to identify the potentially significant effects on the environment of projects they intend to carry out or approve, and to mitigate significant effects whenever it is feasible to do so. AB 32 establishes by law that GHG emissions cause significant adverse impacts to the environment, so this impact is conservatively determined to be significant. Ensuring that the Project's GHG emissions will be mitigated through programs reducing emissions is not feasible at this time. Therefore, this impact is considered significant and unavoidable	Potentially Significant	**GHG-1 Revise Policy LU-3.9 *Plan for Climate Change*** **Revise Policy LU-3.10 Plan for Climate Change.** Plan for the public health implications of climate change, including potential disease and temperature effects, and work with state and county public health agencies to identify necessary programs to reduce, adapt to, and increase resiliency to potential impacts and develop and implement programs to achieve City-wide reductions in greenhouse gas emissions consistent with state targets.	Significant and Unavoidable
Threshold GHG-01*: For the impacts on other GHG emission reduction plans, the analysis focuses on whether the project would be consistent with statewide GHG emission reduction goals?* Quantitative information about GHG emissions from future development projects resulting from the Project are unknown at this time and GHG emission reduction measures developed through Policy LU-	Potentially Significant	**GHG-1 Revise Policy LU-3.9 *Plan for Climate Change*** **Revise Policy LU-3.10 Plan for Climate Change.**	Significant and Unavoidable

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
3.9 are yet-to-be developed so it is uncertain how much GHG emissions will result from the Project and whether those emissions are consistent with or conflict with the targets established in the state's 2022 Scoping Plan. Accordingly, this impact is conservatively determined to be significant. Developing mitigation measures to ensure the Project's GHG emissions will be consistent with state targets is not feasible at this time.			
3.9 Hazards and Hazardous Materials			
Threshold HAZ-01 and 02: *Would development facilitated by the Project has the potential to create a significant hazard to the public or the environments through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?* Future development facilitated by the Project may involve the transportation, use, and/or disposal of hazardous materials from time to time, and may involve equipment or construction activities that use hazardous materials (e.g., coatings, solvents and fuels, and diesel- fueled equipment), cleanup of sites with known hazardous materials, the transportation of excavated soil and/or groundwater containing contaminants from areas that are identified as being contaminated, or disposal of contaminated materials at an approved disposal site. As development facilitated by the proposed Project would be required to comply with the federal and state regulations in addition to the policies defined in the Draft Safety Element (2019), the	Potentially Significant	**GEO-1: Adopt Draft Safety Element**	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
proposed Project would not create a significant hazard to the public or the environments through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts.			
Threshold HAZ-03: *Would development facilitated by the Project has the potential to emit hazardous emissions or handle hazardous to acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?* The Project proposes land use changes and an expanded SOI area but does not propose specific development projects, or businesses. As such, it is not possible to determine if a future specific use enabled by the Project will result in hazardous emissions or require handling of hazardous or acutely hazardous materials, substances, or waste. Federal and state regulations ensure that existing hazards, including those associated with known hazardous materials sites, are addressed prior to development. Compliance with federal and state regulations would ensure that potential impacts associated with the hazardous conditions on sites listed pursuant to Government Code Section 65962.5 Cortese List would be less than significant.	Potentially Significant	**GEO-1: Adopt Draft Safety Element**	Less than Significant
b: Development facilitated by the Project has the potential to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
and, as a result, create a significant hazard to the public or the environment? There are ten (10) locations with a Willits address that are listed in the EnviroStor database (DTSC, 2019), including one (1) listed as Inactive – Needs Evaluation and the remaining nine (9) are referred to the RWQCB, which are subject to various federal and state laws and regulatory agencies, including the CERCLA, EPA, DTSC, and RWQCB. The Project does not propose specific development projects; however, development facilitated by the Project could create a hazard to the public or the environment through a disturbance or release of contaminated materials if the development occurs on or adjacent to contaminated sites without appropriate measures to contain or mitigate the existing contamination.			
Threshold HAZ-05: *Development facilitated by the Project would not be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport and would not result in a safety hazard or excessive noise for people residing or working in the project area.* Willits Municipal Airport is owned and operated by the City. A portion of the Planning Area is located within the airport influence area and approach and overflight safety zones; however, the Land Use Change Areas and SOI areas are located outside airport zones. Implementation of the Draft Safety Element policies and actions discussed above, as well as federal and state regulations, would lessen	Potentially Significant	**GEO-1: Adopt Draft Safety Element**	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
potential impacts from future development facilitate by this Project.			
Threshold HAZ-06*: Development facilitated by the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.* The Project may facilitate new development, including residential, commercial, industrial, and public projects, which would result in increased jobs and population in Willits. Road and infrastructure improvements would most likely occur to accommodate the new growth. Through the implementation of this mitigation measure, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Potentially Significant	**GEO-1: Adopt Draft Safety Element**	Less than Significant
Threshold HAZ-07*: Development facilitated by the Project has the potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.* Development facilitated by the proposed Project would be required to comply with the provisions of federal, state, and local requirements related to wildland fire hazards, including state fire safety regulations associated with WUIs, fire-safe building standards, and defensible space requirements, and the Draft Safety Element (2019) policies, once adopted.	Potentially Significant	**GEO-1: Adopt Draft Safety Element**	Less than Significant
3.10 Hydrology and Water Quality			
Threshold HYD-01*: The proposed Project would not violate any water quality standards or waste*	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
discharge requirements or otherwise substantially degrade surface or groundwater quality. Water quality within the Planning Area is regulated by federal, state, and local regulations. Although the Basin, in which the Planning Area is located, has a LLVGMP, this plan is voluntary and non-regulatory. As development facilitated by the proposed Project would be required to comply with the CGP and City of Willits Standards (2011), and the proposed Project contains policies consistent with protecting surface water and groundwater quality, the proposed Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.			
Threshold HYD-02*: The proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that may impede sustainable groundwater management of the basin.* The Planning Area obtains water through the City's water system from both surface water and groundwater. The water system has sufficient water to serve the Planning Area during times of non-drought, and the City of Willits Council could approve an increase in groundwater usage during time of emergency, therefore, the water system would have adequate water supply to serve current demand and future development that may be facilitated by the proposed Project. Additionally, as groundwater in the Basin appears to recover quickly from declines, the proposed Project would not	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
interfere with groundwater recharge or impede sustainable groundwater management			
Threshold HYD-03*: The proposed Project would not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation, substantially increase the rate or amount of surface runoff, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows.* The proposed Project may facilitate new development and there would be a potential for erosion during grading activities. However, new development within the Planning Area would be required to comply with the City of Willits Standards (2011) and CGP, which include erosion control specifications and BMPs. The proposed Project may facilitate new development that may increase impervious surfaces. However, the City of Willits Standards (2011) requires projects that disturb one (1) acre or more to prepare and implement a SWPPP in accordance with the CGP. Additionally, projects that result in less than one (1) acre but are part of a larger common plan of development, such as the proposed Project, that totals one or more acre of land disturbance. are required to obtain coverage under the CGP. New development facilitated by the proposed Project would not substantially alter the existing drainage pattern in a manner that would result in	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
substantial erosion or siltation or substantially increase the rate or amount of surface runoff. Therefore, the proposed Project and development facilitated by the proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Portions of the Planning Area are mapped as 100-year and 500-year flood zones, primarily in the northeastern portion of the Planning Area. The Sphere of Influence Areas and Land Use Change Areas containing flood zones would have the potential to facilitate additional residential development. However, new development within the Planning Area would be required to comply with Title 17 Sections 38 and 40 of the City of Willits Municipal Code, which regulates development in flood zones. New development within the Planning Area would also be required to comply with the City of Willits Standards (2011), which contain standards for stormwater drainage. As such, new development would be designed in a way to protect life and minimize property damage as well as avoid impeding or redirecting flood flows.			
Threshold HYD-04: *The proposed Project and development facilitated by the proposed Project would not result in flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation.* Portions of the Planning Area are mapped as 100-year and 500-year flood zones, primarily in the northeastern portion of the Project Area. The	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Sphere of Influence Areas and Land Use Change Areas containing flood zones would have the potential to facilitate additional residential development. However, the City of Willits Standards (2011) requires projects that disturb one (1) acre or more prepare and implement a SWPPP in accordance with the CGP. However, the City of Willits Standards (2011) requires projects that disturb one (1) acre or more prepare and implement a SWPPP in accordance with the CGP. Additionally, projects that result in less than one (1) acre but are part of a larger common plan of development, such as the Project, that totals one or more acre of land disturbance are required to obtain coverage under the CGP.			
Threshold HYD-05: *The Proposed Project and development facilitated by the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.* The LLVGMP (2020) is a voluntary and non-regulatory plan, and therefore, the proposed Project does not need to comply with it. No relevant water quality control plan or sustainable groundwater management plan to the Planning Area exists. However, the proposed Project and development facilitated by the proposed Project would not have a significant impact on groundwater supply or water quality due to compliance with federal, state, and local regulations.	Less than Significant	None required	Less than Significant
3.11 Land Use and Planning			

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Threshold LU-01: *Would the project physically divide an established community?* Implementation of the Land Use Element would update land use designations to current land use conditions ensuring orderly development in the Project Area and would not physically affect an established neighborhood, therefore impacts are anticipated to be less than significant.	Less than Significant	None required	Less than Significant
Threshold LU-02: *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?* The Land Use Element takes into consideration existing plans, policies, and regulations to create cohesive policies and implementation measures for the Willits Project Area. Therefor the impact of Project implementation is expected to be less than significant.	Less than Significant	None required	Less than Significant
3.12 Mineral Resources			
Threshold Min-01: *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?* There are no known or identified mineral resource sites anywhere within the Planning Area or sites utilized for mineral extraction and the General Plan Conservation and Open Space or Land Use Element does not include policies or programs related to alteration of any natural material extraction.	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Threshold Min-02: *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?* There are no sites within the City of Willits or Proposed SOI Area utilized for rock or sand extraction or that are identified by the City or the County's General Plans. Therefore, there would be no loss of availability of a locally important mineral resource recovery site due to the proposed project.	Less than Significant	None required	Less than Significant
3.13 Noise			
Threshold NOI-01 and 02: *Would the Project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies or generate excessive groundborne vibration or groundborne noise levels?* The Planning Area is partially developed with uses that contribute to the existing noise environment. The Project may facilitate new development that would contribute to noise and groundborne vibration levels and/or be affected by the existing noise environment, depending on its location and land use. As future development facilitated by the Project would be evaluated by the City for conformance with existing policies and regulations, the Project would not cause the generation of a substantial temporary or permanent increase in ambient noise levels in the Planning Area in excess of established standards.	Less than Significant	None required	Less than Significant
Threshold NOI-03: *For a project located within the vicinity of a private airstrip or an airport land use plan*	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? Ells Field, also known as the Willits Municipal Airport (FAA LID: O28), is within an incorporated island of the City and located approximately 1.75 miles north of the core City of Willits incorporated area. Ells Field is the only airport in the Planning Area and is owned and operated by the City, and within the City. The Ells Field compatibility zones do not extend much beyond the runway and would not affect nearby noise-sensitive receptors. Additionally, the Land Use Change Areas and SOI Areas are not located near the airport or affected by noise compatibility areas.			
3.14 Population and Housing			
Threshold Pop-1: *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).* Implementation of the project would facilitate the construction of new housing to accommodate population growth, and development would be consistent with the General Plan and Land Use Element policies and implementation measures. Therefore, potential impacts resulting from unplanned direct and indirect population growth from the Project would be less than significant.	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Threshold Pop-2*: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?* The Land Use Element Update encourages infill and new development in an organized manner which would minimize the displacement of existing people or housing. It also incorporates community participation and environmental justice as part of land use policies. As such, the anticipated impacts of implementation of the Land Use Element would improve existing housing stock and provide new housing and result in a less than significant impact on displacement of people or housing and/or construction of replacement of housing.	Less than Significant	None required	Less than Significant
3.15 Public Services			
Threshold PS-01a: *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?* Implementation of the Project would facilitate development and a resulting increase in population and structures would increase demand for fire protection services and could create the need for new or expanded fire protection facilities and equipment. General Plan policies direct the City to cooperate with Little Lake FPD in developing standards and guidelines to assure adequate fire protection to accommodate population growth.	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Therefore, impacts to fire protection services would be less than significant.			
Threshold PS-01b: *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?* Implementation of the Project would facilitate development to accommodate population growth. The increase in estimated population would increase demand for police protection services but not beyond the capacity of the current facility to meet the increased demand at an acceptable service ratio. Therefore, there is no foreseeable need to physically alter or build new government facilities and the physical impact on the environment from implementation of the Project is expected to be less than significant.	Less than Significant	None required	Less than Significant
Threshold PS-01c: *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?* TK-12 grade school enrollment at Willits Unified School District is not anticipated to exceed capacity	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
with population growth and campus grounds have space for expansion from new additions or modular units, impacts are therefore expected to be less than significant.			
3.16 Recreation			
Threshold REC-01*: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?* Development facilitated by the project would result in an increase in housing and population, which would increase the use of existing parks and recreational facilities. Existing General Plan's Public Services and Facilities, Parks and Recreation Element and proposed policies of the Land Use Element Amendment requires that the parklands to resident ratio standard be maintained limiting the potential for parks physical deterioration, therefore expected physical impacts on recreational facilities through deterioration or accelerated deterioration due to the project would be less than significant.	Less than Significant	None required	Less than Significant
Threshold REC-02: *Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?* Housing and population growth facilitated by the project could reduce the city's parkland to population ratio. However, the General Plan requires residential developers to set aside lands or provide in-lieu fees and the Land Use Element Update would implement strategic planning to	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
ensure that the City's parkland standard of five acres per 1,000 residents is maintained. Future park development by the City or developers would be subject to CEQA review. Therefore, impacts to the physical environment associated with the project due to park facilities construction or expansion would be less than significant.			
3.17 Transportation Circulation			
Threshold TRAN-01: *Would the Project disrupt existing bicycle and pedestrian facilities or interfere with planned facilities or cause a physical change inconsistent with bicycle and pedestrian policies contained in the City of Willits General Plan and the City of Willits Bicycle and Pedestrian Specific Plan?* The City will remain relatively compact with existing development and new growth concentrated in an area of approximately 2.5 by 3 miles where any vehicle trips generated will be relatively short in length compared to 9.5-mile average trip lengths for Mendocino County. As a result, population and employment growth in this area would be expected to generate VMT per capita at rates similar to baseline conditions.	Less than Significant	None required	Less than Significant
Threshold TRAN-02: *Would the Project disrupt existing transit service, interfere with planned transit service, or cause a physical change inconsistent with transit policies contained in the City of Willits General Plan?* The proposed Project does not propose transportation network modifications that would disrupt existing or interfere with planned bicycle facilities. The proposed project's land use and policy	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
changes may generate demand for new bicycle trips. The city's compact form makes it highly accessible by both pedal and electric bicycles (e-bicycles). The policy changes below will contribute to improving the existing bicycle environment			
Threshold TRAN-03: *Would the Project result in modifications to the study area transportation network that are not consistent with the applicable design standards?* The proposed project does not propose transportation network modifications that would disrupt existing or interfere with planned pedestrian facilities. The proposed project's land use and policy changes may generate demand for higher levels of walking. The policy changes below will contribute to improving the existing pedestrian environment.	Less than Significant	None required	Less than Significant
Threshold TRAN-04: *Would the Project generate home-based VMT per resident or home-based work VMT per employee at rates that are greater than the citywide average under baseline conditions?* The proposed project does not propose transportation network modifications that would disrupt existing or interfere with planned transit facilities or services. As growth occurs within the proposed sphere of influence, new transit needs may emerge such as new stops along MTA Route 65. The Mendocino Council of Governments annually seeks public input and citizen participation to identify unmet transit needs in the region. Therefore, this impact is less than significant.	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
3.18 Utilities and Service Systems			
Threshold UTL-01: *Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?* Development facilitated by the Project would create additional demand for water, wastewater, electricity, natural gas, telecommunication and stormwater drainage facilities. Relevant policies proposed as part of the Project include Policies LU-1.1, LU-1.2, and LU-1.3, below, which plan for a range of potential population growth levels within the City. These direct growth to where infrastructure either already exists or doesn't exceed the capacity of existing infrastructure.	Less than Significant	None required	Less than Significant
Threshold UTL-02: *Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?* Future growth and development facilitated by the Project would create additional demand for water in the Land Use Change Areas within the city limits, as well as within the SOI Area. Overall, the City appears to have sufficient water supply to serve the projected population of 7,500 persons planned for in this Draft PEIR, and additional development within the population planned for in this Draft PEIR would	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
not necessitate the development of an additional water source			
Threshold UTL-03: *Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments ?* With the City's current contribution of an average of 390,000 GPD, or 0.39 MGD of wastewater to the inflow of the City's WWTP, it is anticipated that the City would contribute a total of approximately 559,456 GPD, or 0.56 MGD, if the development analyzed in this report were to occur. As the City's share of the WWTP ADFW treatment capacity is 0.64 MGD, the City's would have adequate capacity to provide wastewater services to the projected population under the Project.	Less than Significant	None required	Less than Significant
Threshold UTL-04*: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?* Implementation of the Project would be anticipated to generate additional solid waste. Although the Project may facilitate development that would generate solid waste, it would not be in excess of state or local standards or the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	Less than Significant	None required	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Threshold UTL-05: *Would the Project comply with federal, state and local management and reduction statutes and regulations related to solid waste?* As stated previously, the Project Area is currently served by SWOW and is required to comply with federal, state, and local management regulation related to solid waste. This would not change under the Project, only additional potential development may occur, in line with existing development. With continued compliance with the applicable regulations, leading to increased recycling and waste diversion, and adherence to the proposed General Plan goals, policies, and actions, anticipated rates of solid waste disposal from the proposed project would be less than significant with respect to permitted landfill capacity.	Less than Significant	None required	Less than Significant
3.19 Wildfire			
Threshold WF-01: *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?* The Land Use Element would foster the development of residential, commercial, industrial, and public land uses and to accommodate increased jobs and population. The timing, location and scale of development allowed of the Land Use Element is not known, but Land Use Element policy is intended to avoid hindering established evacuation routes and ensure orderly road and infrastructure improvements to prevent negative impacts on evacuation access. With the adoption of the Draft Safety Element, the potential for the Land Use Element Update to impair an adopted	Potentially Significant	**Mitigation Measure GEO-1** defined in Section 4.7 Geology and Soils Impact GEO-1 w	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
emergency response plan or emergency evacuation plan would be less than significant with mitigation.			
Threshold WF-02: *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?* Willits is identified as Wildland-Urban Interface (WUI) in the CAL FIRE FHSZ Viewer, with many parts of the Project Area falling within Moderate and High Fire Hazard Severity Zones. However, there are no proposed SOI areas or land use designation changes in areas with very high FHSZs. The adoption of the Draft Safety Element would be required to mitigate the potential for the Land Use Element Update to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire to less than significant.	Potentially Significant	**Mitigation Measure GEO-1** defined in Section 4.7 Geology and Soils Impact GEO-1	Less than Significant
Threshold WF-03: *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?* Development consistent with the Land Use Element may require the installation or maintenance of associated infrastructure. The adoption of the Draft Safety Element would be required to mitigate to less than significant levels, the potential for the Land Use Element Update to require the installation or	Potentially Significant	**Mitigation Measure GEO-1** defined in Section 4.7 Geology and Soils Impact GEO-1	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
maintenance of associated infrastructure that may exacerbate fire risk.			
Threshold WF-04*: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?* New development consistent with the Land Use Element facilitates may be located in areas that would be impacted by downslope/downstream flooding or landslides, post-fire slope instability, or drainage changes. With the adoption of the Safety Element which contains policy to ensure future development in areas impacted by flooding and landslides which would also be impacted by a postfire instability, is appropriately sited and designed, the potential impacts of Land Use Element implementation will be less than significant.	Less than Significant	None required	Less than Significant
Impact WF-05a: *Attorney General's Evacuation Interim Guidance 1) Proximity to Wildfire Hazard; 2) Project Density; 3) Project Location with respect to Wildfire Hazard; 4) Demographics; 5) Evacuation Access; and 6) Evacuation Egres.* The Land Use Element is a programmatic Project which has a neutral impact on existing conditions in the City for Categories 1-6 aside from the policy regarding Emergency Evacuation which positively affects future conditions. Many of the issues of concern identified by the categories are existing conditions and Project impacts would be less than significant impacts by updating and adopting the City's 2019 Draft Safety Element.	Potentially Significant	**Mitigation Measure GEO-1** defined in Section 4.7 Geology and Soils Impact GEO-1 **Mitigation Measure WF-01.** Prior to adoption of the Draft Safety Element, review, an update shall be required to is consistent with applicable state legislation that has been passed since the draft's preparation in 2019.	Less than Significant

Summary of Environmental Impact	Level of Significance Under Proposed Plan	Mitigation Measures that Address the Impact	Significance After Mitigation
Impact WF-05b: *Attorney General's Evacuation Interim Guidance 7)* Consideration of Project Wildfire Risk Reduction Measures. The Land Use Element has a neutral impact on existing Wildfire Risk Reduction Measures. Updating and adopting the City's 2019 Draft Safety Element would lessen impacts relating to potential wildfire evacuation impacts from the Land Use Implementation would be less than significant.	Potentially Significant	**Mitigation Measure GEO-1** defined in Section 4.7 Geology and Soils Impact GEO-1 **Mitigation Measure WF-01.** Prior to adoption of the Draft Safety Element, review, an update shall be required to is consistent with applicable state legislation that has been passed since the draft's preparation in 2019.	Less than Significant

2.0 PROJECT DESCRIPTION

A "Project," as defined by the California Environmental Quality Act (CEQA) Guidelines, means "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)…enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700" (14 Cal. Code of Reg. 15378[a]).

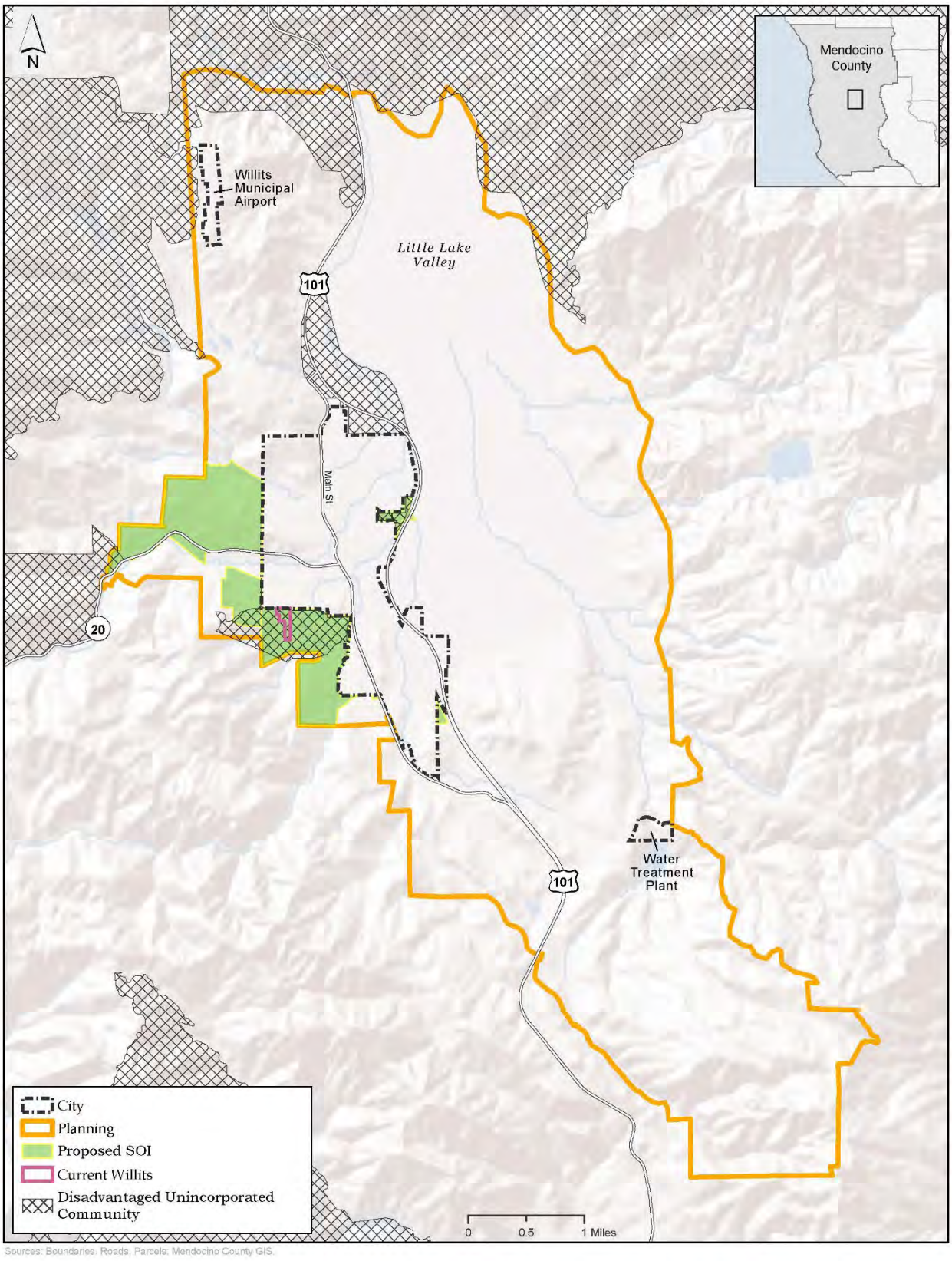
The proposed Project is an amendment to the City of Willits Land Use Element and Land Use Diagram. The Project includes:

(1) the identification of a Planning Area that includes the City as well as surrounding land that bears relation to City planning;
(2) changes to existing and new Land Use Element policy intended to expand the land supply for housing of all types, provide for focused planning for Willits' commercial centers, provide for land use flexibility and compatibility, ensure community health and vitality and environmental health and sustainability, and to expand and improve land use designations and general plan maintenance;
(3) changes to Land Use Designations within the City to support residential and commercial development, as well as for open space purposes, and changes to apply Land Use Designations that best reflect the use and character of existing development within the City where the current Land Use Designation is not appropriate;
(4) proposed expansions to the City's Sphere of Influence, with the application of appropriate City Land Use Designations, to support a potential Sphere of Influence Amendment application to the Mendocino Local Agency Formation Commission;
(5) amendments to the Zoning Map and Zoning Regulations to ensure consistency with the Land Use Element and Land Use Map, which may occur simultaneously with or closely following Land Element adoption, and that may include the application of consistent Zoning Classifications and edits to the Zoning Regulations to ensure consistency.

The Project Area is a portion of the City of Willits Planning Area (see Figure 2-1) that is comprised of the entire City of Willits, in particular the proposed Land Use Change Areas within the City, and the Proposed Sphere of Influence Area.

The Land Use Element has been prepared in accordance with State planning law, as provided in California Government Code Section 65300. The General Plan is meant to be a framework for guiding planning and development in the City, for the next approximately 20 years and can be thought of as the blueprint for the City's growth and development. This element is intended to be comprehensive both in its geography and subject matter. It addresses the entire territory within the City's incorporated boundaries and areas outside the City into which the City may expand, as well as a broad spectrum of issues associated with the future buildout of the City.

Figure 2-1 Planning Area



2.1 PROJECT OBJECTIVES

All cities and counties in California are required to adopt and periodically update a comprehensive, long-range general plan that outlines goals and policies for the physical development of the community (California Government Code Section 65300). A general plan is intended to:

- Identify the community's land use, circulation, and environmental goals and policies as they relate to land use and development.
- Provide a basis for local government decision-making, including decisions on development approvals.
- Provide citizens with opportunities to participate in planning and decision-making processes in their community.
- Inform citizens, property owners, developers, and decision-makers of the ground rules that guide development within the community.

According to California Government Code Section 65302, General Plans are required to cover the following elements or topics: land use, circulation, housing, conservation, open space, noise, safety, and environmental justice. Jurisdictions may include any other topic that is relevant to planning its future. The Project includes updates to the Land Use Element. The City has an adopted Housing Element (2019-2027) and the other elements (Circulation, Conservation and Open Space, Noise, Public Services and Recreation, Safety, and Economic Development) were adopted as part of the Willits General Plan, Vision 2020, in 1992. A draft Safety Element reflecting current law and the Mendocino County Multi-Jurisdictional Hazard Mitigation Plan was prepared in 2019 and will likely be approved in 2024.

The revisions to the City's Land Use Element are intended to apply to a period extending for approximately the next 20 to 30 years. Since the community will change and evolve over time, the General Plan Land Use Element and the other elements will need to periodically evolve as well.

2.2 REGIONAL SETTING

The City of Willits is located in central Mendocino County, approximately 24 miles north of Ukiah and 35 miles east of Fort Bragg and the Pacific Ocean. Willits is located within Little Lake Valley, which is nearly surrounded by the inner and outer Northern Coast Range. Willits is a sub-regional commercial and industrial center at the intersection of U.S. 101 and State Route 20. U.S 101 is a major north-south route which is a freeway as it runs along the eastern edge of the City, connecting Willits to Humboldt County to the north and the San Francisco Bay Area region to the south. State Route 20 serves as the City's South Main Street and connects the Mendocino Coast in the west to the Sacramento Valley. California Western Railroad, more commonly referred to as the Skunk Train, provides excursion rail service from Willits west to Fort Bragg. Willits Municipal Airport is a public airport within an island area of the City, located approximately three miles northwest of the City center.

The City encompasses a total of approximately 2.8 square miles and is comprised of three separate areas: the main City center area is approximately 2.6 square miles; the Willits Municipal Airport is approximately 0.1 square miles; and the Water Treatment Plant and Morris Reservoir dam area is approximately 0.06 square miles. The City also owns the approximately 4.5 square mile watershed above Morris and Centennial Reservoirs, but this area is not located within City boundaries.

2.3 GENERAL CHARACTERISTICS OF THE PLANNING AREA

California planning law requires the City to adopt a general plan for lands within its limits and any land outside of its boundaries which bears relation to its planning. Defining a Planning Area that includes land outside of its boundaries is a means by which a City can communicate its desires to annex land to the City or its objectives and concerns for the future of surrounding lands under the jurisdiction of the County.

The proposed City of Willits Planning Area includes lands to which the City provides utility services, such as water service and to a lesser degree wastewater service; areas where the City has utility infrastructure, such as the City's wastewater treatment plant or that its infrastructure is dependent upon, such as the watersheds for the City's reservoirs or the hazard areas around the City's airport; and areas where development could have an impact on the City, such as the Little Lake Groundwater Basin that is so essential to the City's water supply. Within the Planning Area, the City proposes to apply Land Use Designations within areas that the City seeks to include within its Sphere of Influence and may adopt specific policies that relate to the City's interest.

PLANNING AREA

The following is a general description of the areas beyond the City boundary that bear a relationship to the City of Willits and why they are proposed to be included in the City's Planning Area.

- **Willits Municipal Airport (Ells Field) Airport Land Use Compatibility Zones.** The City has an interest in the areas outside of Ells Field Runway Protection Zone, which is within the Willits City boundary, which are classified by the Mendocino County Airport Land Use Commission as part of the Approach/Departure Zone and Adjacent to Runway (Zone B1) and the Common Traffic Pattern (Zone C). Within these areas land uses are at risk of off-airport aircraft accident or emergency landing (Zone B1 - substantial risk) and (Zone C - moderate risk). This area is approximately 1,600 acres, including Ells Field. In addition to the safety of people on the ground, the City is concerned with maintaining the airspace around the airport free obstructions to ensure safe aircraft operation and to ensure that incompatible land uses near the airport due not result in conflicts with airport operations relating to noise levels are the perceived nuisance to land uses of aircraft overflight. The City of Willits sees it in its interest to ensure that development is limited within these areas based on current planning practices to ensure the economic vitality of Ells Field.

  Mendocino County General Plan Land use designations in this area are predominantly Suburban Residential, Rural Residential, Remote Residential, Range Lands, and Forest Lands. On the west side of Ells Field there are numerous small developed and vacant parcels planned Suburban Residential and Commercial that may be within airport hazard areas and where incompatible development could limit future airport operations.

- **Morris and Centennial Reservoir Watersheds.** The Morris and Centennial reservoirs and their watersheds comprise approximately 2,800 acres and are critical assets to the City and portions of the Morris Reservoir are within the City limits. The City acquired the private Little Lake Water Company in November of 1983, which was originally established by the Pacific Gas and Electric (PG&E) Company. The purchase of the water system included the water facilities and watershed lands of approximately 3,136-acres with Morris Lake and Dam, all timber situated on the property, and associated permits, licenses, easements, and franchise agreements. This entire area is planned Open Space in the Mendocino County General Plan.

- **Little Lake Valley and Groundwater Basin.** The Little Lake Valley area is approximately 8,300 acres in area is generally comprised of the Little Lake groundwater basin and agricultural land that extends north from Morris and Centennial reservoirs to. This area contains City wastewater treatment and disposal facilities, agricultural and grazing lands and rural residences. Approximately 125 parcels containing rural residences in this area receive City water through the City of Willits water system.

  Mendocino County General Plan Land use designations in this area include Forest Lands and Range Lands, with smaller areas planned Rural Residential, within the hill slopes north of East Hill Road and Agriculture and a small amount of Rural Residential land north of East Hill Road to the end of the Little Lake Valley near the Reynolds Highway.

- **Rural Residential Land Adjacent to the City Planned for Development.** There is approximately 2,800 acres of land, located primarily on the west side of the City, which is planned for suburban and rural residential, industrial, and public land uses. These areas include parcels on either side of Sherwood Road between the City boundary and the Brooktrails Township Community Services District; area on either side of State Route 20 extending about 1.5 west of the City; the Della Avenue and Locust Street area south of Holly Street, which includes the Sherwood Valley Rancheria; and most areas west of State Route 20 between the Muir Hill Road/Baechtel Road intersection to where the railroad right of way crosses under U.S 101. Although many properties in this have on-site water and wastewater system, most of the developed parcels in this area (approximately 300) receive City water service and many parcels in in the Meadowbrook Drive/Della Avenue area have City wastewater service. These lands are important to the City because City water service is provided and these lands are generally planned for residential development and located adjacent to the City, and if these lands are to be developed further sewer service will likely be required and it may be appropriate to consider these lands for inclusion in the City in the future.

  Mendocino County General Plan Land use designations in this area are predominantly Suburban Residential, Rural Residential, Remote Residential. One parcel which receives City water service and is Planned Suburban Residential is zoned for grazing uses and is subject to an agricultural preserve agreement between the County and the property owner.

Table 2-1 a listing of the areas included in the City's proposed Planning Area boundary:

Table 2-1, Proposed City of Willits Planning Area	
Description	**Acres**
City Boundary (City Center)	1,692.7
Water Treatment Plant (City)	36.1
Airport (City)	73.1
Suburban Residential (existing SOI)	12.2
Multi-Family Residential	4.3
Suburban Residential	1,017.9
Rural Residential	475.1
Remote Residential	1,068.3
Industrial	97.9
Rangeland with City Water Service	126.0
Little Lake Valley* with City Water Service	1,140.3

Table 2-1, Proposed City of Willits Planning Area	
Description	**Acres**
Little Lake Valley* (remainder)	10,726.9
General Airport Influence Area	639.0
Public Land	11.2
Total	**17,240**

*The Little Lake Valley is comprised of land planned for agricultural purposes, but also contains pockets of Rural Residential land and parcels and both land use designations have parcels with City water service.

CITY OF WILLITS EXISTING LAND USE PATTERN

The current 1992 General Plan Land Use Element specifies eight Land Use Designations that may be applied to land within the City. Table 2-2 displays the distribution of existing Land Use Designations applied to land within the City. The Agricultural – General (A-G) Land Use Designation is not currently applied. The existing Land Use Designations define the range of allowable land uses of land within the City and the Zoning Regulations establish Zoning Districts that are intended to be consistent with the General Plan Land Use Map and specify use groups that are consistent with the allowable uses of the General Plan Land Designations.

Table 2-2, Current General Plan Land Use		
Land Use Designation	**Acres**	**Percent**
Residential-low Density (R-L)	341	19%
Residential-Medium Density (R-M)	155	9%
Residential-Suburban (R-S)	187	10%
Commercial-General (C-G)	317	18%
Industrial-General (M-G)	508	28%
Public Service (PS)1	264	15%
Open Space – Recreation (0-R)	29	2%
Agricultural – General (A-G)	0	0%
Total	**1,801**	100%

Note 1: This includes the Willits Municipal Airport (Ells Field) and the Willits Water Treatment Plant and Morris Dam portions of the City of Willits.

The existing land use pattern in the City of Willits is characterized by commercial uses in the historic downtown area and along South Main Street, industrial areas on the east side of the city, residential neighborhoods surrounding downtown as well as on the west and south sides of the City. The following is a distribution of the land uses within the City based on the Assessor's Land Use Code applied to each parcel of land. Although 30 percent of the City is planned for industrial uses and only ten percent of the land in the City is identified as being used for industrial purposes. This is partly explained by the fact that a considerable portion of U.S. 101 is planned Industrial-General (M-G) and there are many vacant industrial parcels. Also, nearly 20 percent of the City is planned Commercial General (C-G) and only eight percent of land is identified to be used for commercial purposes. This is partly explained by the fact that many parcels planned "C-G" contain single- and multiple-family residences.

Figure 2-2 Existing Land Use Map

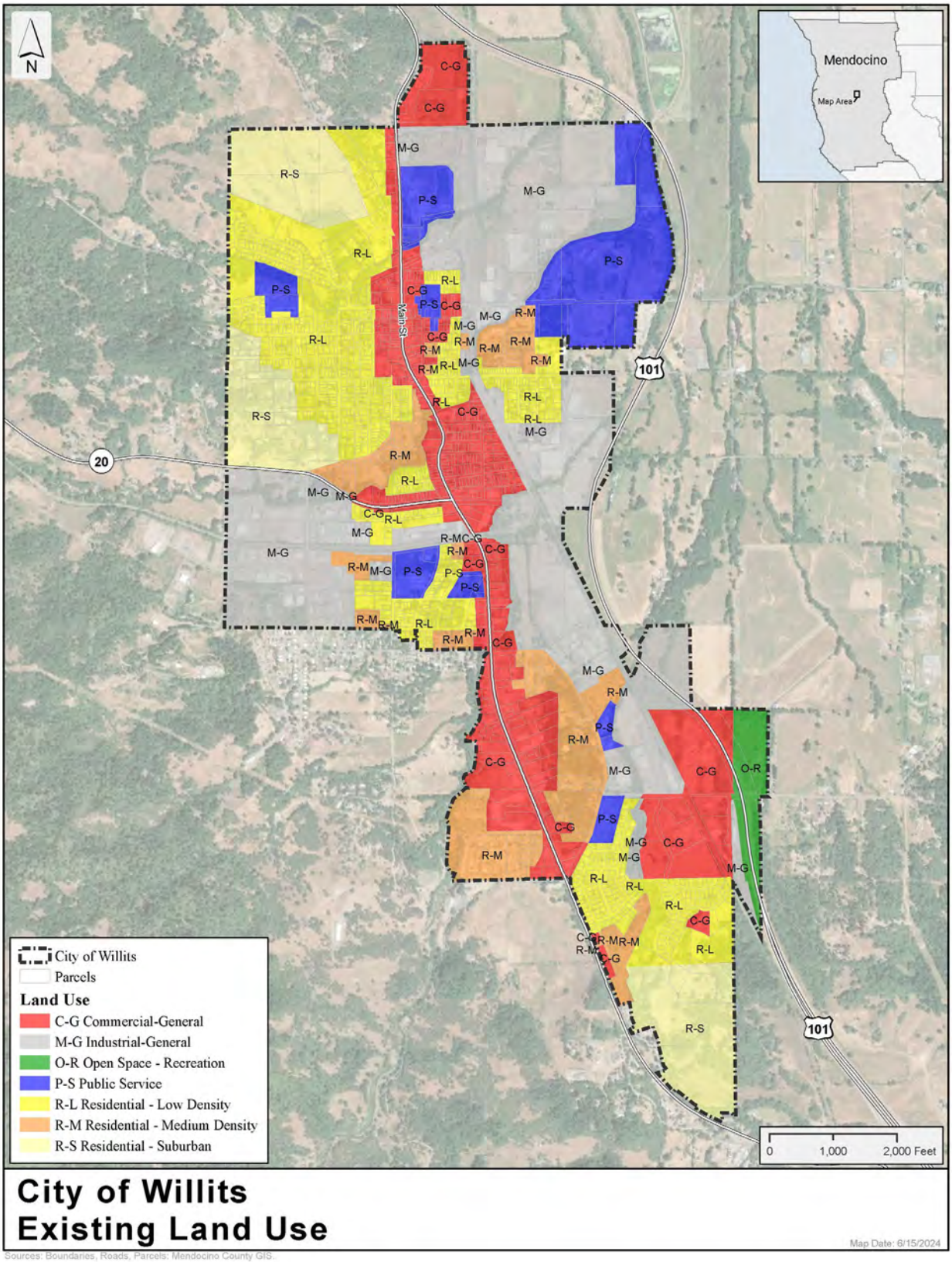


Table 2-3, Existing Land Uses within the City of Willits		
Summary Grouping of Uses	**Acres**	**Percent**
Single Family Residential	436.1	24%
Multiple Family Residential	160.8	9%
Commercial	137.1	8%
Industrial	161.7	9%
Health Care	5.5	0%
Public or Quasi Public[1]	143.74	8%
Street or Parking Area	197.1	11%
Open Land	80.0	4%
Vacant	467.4	26%
Total[2]	**1,789.4**	**100%**

1. This includes the Willits Municipal Airport (Ells Field) and the Willits Water Treatment Plant and Morris Dam portions of the City of Willits.
2. Acreage is based on Assessors Parcels which may not include all rights of way and will differ from the total acres of total City boundary.

SPHERE OF INFLUENCE

Within the City of Willits Planning Area, the City is seeking to expand its Sphere of Influence (SOI) to allow the supply of land within the City to be expanded to accommodate potential future growth. An The Cortese-Knox-Hertzberg (CKH) Local Government Reorganization Act of 2000 defines an SOI as a City's probable physical boundaries and service area as determined by the Local Agency Formation Commission (LAFCo). Designating lands as part of the SOI allows the City to plan for the eventual annexation and extension of services as part of community growth; and allows the City to designate uses compatible with adjacent City lands. The City's SOI is adopted, as required by state law, by the Mendocino LAFCo.

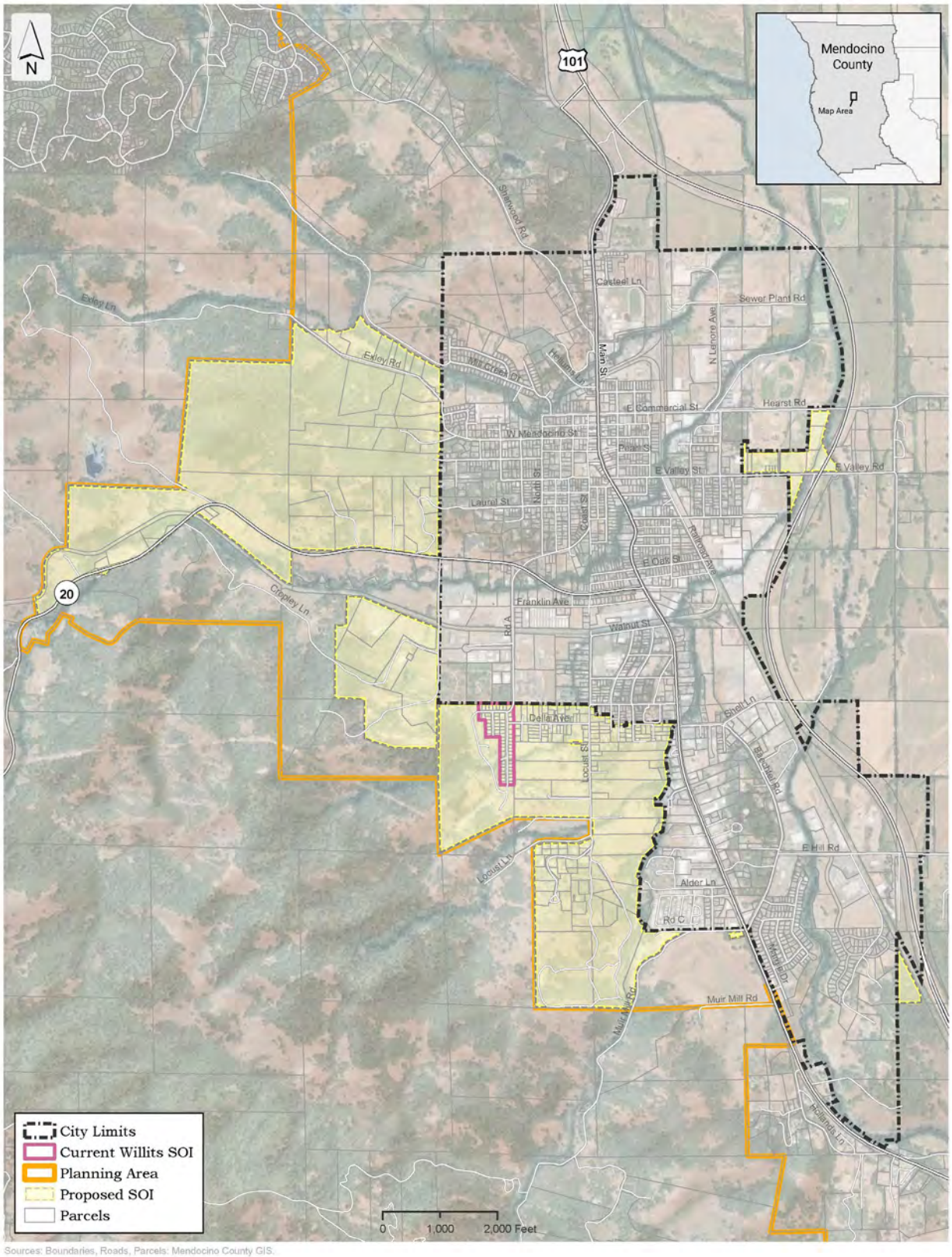
Existing SOI

The existing SOI is located on the west side of the city, midway from north to south, and is approximately twelve acres in area. Land within the SOI is divided into small lots that are almost entirely developed with manufactured homes. The SOI contains 61 Assessor's parcels (there are 57 landowners, four of which own two parcels each), 58 of which are improved with single family dwellings or manufactured homes and three are vacant (one of the vacant parcels serves as yard area for an adjacent manufactured home).

The existing SOI is identified as a Disadvantaged Unincorporated Community (DUC), which is defined by state law as an area that contains 12 or more registered voters that has an annual household income that is less than 80 percent of the statewide median household income, based on the CALAFCO Statewide DUC Map.

The Meadowbrook Manor County Sanitation District (MMCSD) is the wastewater provider to the entire SOI plus 47 additional parcels located outside the SOI along Della Avenue and Locust Street. The MMCSD has an agreement with the City of Willits to provide wastewater service to development within the District. There is one vacant parcel within the SOI and if it is to be developed it must be connected to the wastewater system, because the Mendocino County Code prohibits any development utilizing onsite septic within the MMCSD. All residents in the SOI area have City of Willits water service.

Figure 2-3 Proposed Sphere of Influence



2.4 GENERAL ASSUMPTIONS

POPULATION AND HOUSING

Past and Current. The City of Willits has not experienced substantial population or housing growth over the last 20 years. Between Census 2000 and 2010, Willits total population fell by 3.7 percent, resulting in a loss of 185 persons from 5,073 to 4,888. Between 2010 and 2020, City population increased from 4,888 to 4,947, an increase of 59 persons or a total change of 1.2 percent. Between 2010 and 2020, the average annual growth rate was approximately 0.13 percent, or adding about six persons per year.

While the City of Willits population declined between Census 2000 and 2010, the total number of housing units increased by 60 units or a total change of three percent, increasing from 2,013 to 2,073 units. The average annual housing growth rate during this period was 0.29 percent per year. Between 2010 and 2020, housing units within the City increased from 2,073 to 2,147 units, an increase of 74 units or a total change of 3.6 percent. The average annual housing growth rate during this period was 0.35 percent per year. Between 2020 and 2024, an additional 22 housing units were added at an annual average rate of 0.45 percent, or a total change of slightly more than one percent.

Table 2-4, City of Willits Housing and Population Growth 1990 to 2022

Year	Population	% Change from Last Census	Year to Year % Change	Housing Units	% Change from Last Census	Year to Year % Change
1990	**5,027** [1]			**1,968** [1]		
2000	***5,073*** [1]	***0.92%***	***0.09%***	***2,013*** [1]	***2.29%***	***0.23%***
2010	***4,888*** [1]	***-3.65%***	***-0.37%***	***2,073*** [1]	***2.98%***	***0.29%***
2011	4,870	-0.37%	-0.37%	2,074	0.02%	0.05%
2012	4,881	-0.14%	0.23%	2,074	0.02%	0.00%
2013	4,957	1.41%	1.56%	2,075	0.04%	0.05%
2014	4,965	1.58%	0.16%	2,082	0.18%	0.34%
2015	4,966	1.60%	0.02%	2,085	0.25%	0.14%
2016	5,025	2.80%	1.19%	2,091	0.37%	0.29%
2017	5,057	3.46%	0.64%	2,098	0.51%	0.33%
2018	5,133	5.01%	1.50%	2,105	0.65%	0.33%
2019	5,107	4.48%	-0.51%	2,106	0.68%	0.05%
2020	**4,947** [1]	***1.21%***	***-3.13%***	***2,147*** [1]	***1.51%***	***1.95%***
2021	4,968	-0.40%	-0.40%	2,152	0.10%	0.23%
2022	4,889	-1.98%	-1.59%	2,157	0.20%	0.23%
2023	4,835	-3.07%	-1.10%	2,160	0.27%	0.14%
2024	4,830	-3.17%	-0.10%	2,169	0.45%	0.42%

1. U.S. Decennial Census.
2. All other population and housing values are estimates from the State Department of Finance.

The average number of persons per household in the City of Willits has been declining. In 2010 there was an average of 2.5 persons per household. Since then, the number of persons per household has declined at an average annual rate of nearly 0.5 percent per year to 2.33 persons per household in 2024. If the current housing supply reflected the higher 2010 persons per household ratio, the demand for housing may be about 100 fewer units. Declines in the average number of persons per household often reflect an aging population or a more affluent population. As the number of persons per household declines, more housing units are needed to accommodate the same size population.

The current City of Willits General Plan (adopted in 1992) considered three potential growth scenarios between the years 1990 and 2020 with average annual growth rates of 1.0, 1.7, and 2.5 percent per year. These growth rates were based on DOF projections, which indicated that the Mendocino County population would increase by 50 percent during this period, an average annual rate of 1.7 percent. The prior General Plan preparers determined that growth within Willits would likely follow the county-wide growth trend and that the 2020 population would therefore be approximately 7,500 (approximately 2,500 or 50 percent more than the Willits Census 2020 population). The General Plan also projected that household size, which was approximately 2.6 persons per household in 1990, would be 3.0 persons per household in future years because large homes were assumed to make up a significant portion of new residential development. Actual household size in 2020 was 2.41 persons per household, according to DOF.

The high Mendocino County growth rates that were anticipated in the 1990's and early 2000's did not occur. Between 1990 and 2020, the total county-wide population grew by about seven percent, rather than the projected 50 percent. During this period, the total City of Willits population declined by about 1.5 percent (the City population did increase to a maximum of 5,133 in 2018, or two percent above the 1990 population and then declined), and the total number of housing units in the City increased by 179 units, or nine percent.

Projections. Regardless of the rate of future population growth, housing growth will likely exceed overall population growth for a number of reasons including continued regional reductions in household size. The average number of persons per household is expected to continue declining nationwide for many decades. The Population Reference Bureau states that "(b)eginning in the 1960s—and accelerating over the last two decades—changes in marriage, cohabitation, and childbearing have played a key role in transforming household composition in the United States. More recently, population aging and shifts in the age distribution of householders are also contributing to these changes in composition." (PRB, Population Bulletin, Volume 71, No. 1, June 2019)

Table 2-5, City of Willits Population and Age Comparison

Demographic	2000	2010	2014[1]	2020[2]
Total population	5,073	4,888	4,853	4,895
Median age (years)	35.8	37.8	46.1	41.7
Average Household size	2.56	2.50	2.23	2.12
Average Family size	3.15	3.13	3.0	3.96
Persons Under 5 years	373	349	356	206
Persons Under 18 years	1,479	1,270	830	922
Persons Age 21+	3,378	3,436	3,834	3,824
Persons Age 55+	1,148	1,372	1,707	1,837
Persons Age 60+	911	1,031	1,262	1,561
Persons Age 65+	709	742	798	1,265
Percent Population Less than 18	29.2%	26.0%	17.1%	18.8%
Percent Population 55+	22.6%	28.1%	35.2%	37.5%

3. Data set used in City of Willits 2019 Housing Element to show age distribution.
4. Not all population data is available from the 2020 US Census, therefore American Community Survey data were used for the year 2020.

Additionally, the Public Policy Institute of California (PPIC) reports that persons per household declined at a rapid rate recently due to the "spreading out" of Californians across more housing units as people sought to limit their exposure to COVID-19 and as remote work allowed many to live farther from their job location. PPIC states that "(t)he number of people per household fell sharply (statewide) at the outset of the pandemic, dropping 2.7% from 2.93 in 2020 to 2.85 in 2021. It then declined again by 1.4% to 2.81 in 2022. During this time, the share of adults heading a household went up. These changes mean that there are now more households for a given population—and that more housing is needed to support this population." Similar changes occurred in the City of Willits, where persons per household declined by 3.2 percent in 2020 and the total change in persons per household from 2019 to 2023 is nearly six percent. In contrast, and based on Department of Finance annual estimates, persons per household in Willits was relatively constant between 2010 (2.50) to 2019 (2.49).

However, it is unclear if this trend will continue going forward. PPIC suggested in November 2022 that "(i)ncreased household formation could continue given the strength of the labor market and underlying demographic trends (e.g., the peak of the millennial generation is still moving through the age range when household formation accelerates) as well as pandemic-driven changes in remote work and where people prefer to live. However, affordability continues to be an important factor discouraging new household formation, and this will worsen as interest rates rise and new mortgages become more expensive."

In July 2023 (revised March 2024), the Department of Finance published interim population projections that reflect the July 1, 2022, state and county population estimates published in December 2022 and that are informed by the U.S. Census Bureau's blended base because not all Census 2020 data were available. These projections suggest that the county-wide population will decline between 2023 and 2028 at an average annual rate of approximately minus 0.2 percent per year and then slowly grow back to approximately the County's 2020 population level in 2043, growing at an average annual rate of approximately 0.05 percent per year.

Table 2-6, Mendocino County Population Projections[1]

	Population	Avg Annual Change for Period	Total Pct Change from 2020
2020[2]	91,601		
2024[3]	89,476	-0.6%	-2.3%
2025	88,580	-0.3%	-3.3%
2030	88,789	0.0%	-3.1%
2035	89,132	0.1%	-2.7%
2040	89,200	0.0%	-2.6%
2043	89,139	0.0%	-2.7%
2045	89,235	0.1%	-2.6%
2050	89,697	0.1%	-2.1%

1. California Department of Finance. Demographic Research Unit. Report P-2A: Total Population Projections, California Counties, 2020-2060 (Baseline 2019 Population Projections; Vintage 2023 Release) March 2024.
2. Census 2020.
3. Department of Finance, Population Estimates Population and Housing Estimates for Cities, Counties, and the State, January 1, 2021-2024, with 2020 Benchmark.

City Population Projections. Population projections are not prepared for cities in California. Future population growth within the City, especially a small city, is uncertain and may reflect projected countywide growth, which suggests that the population will remain steady. The general factors that will likely affect future population growth in Willits, include changes in local demographics (in particular age) and economics (wealth and income of households and local and area-wide employment opportunities), regional and national environment (e.g., regional and global climate conditions which could lead to movement within the County, as well as migration to northern California, relating to loses and recovery from disaster, such as from wildfire), and wildcard factors like the COVID-19 global pandemic.

The City and the local business community have identified the lack of available housing as being directly related to lack of population growth. Further, the local business community has indicated a need to hire more workers and feel that the lack of new housing is the primary issue limiting recruitment efforts. As a result, the City has proposed to increase the supply of land to accommodate potential demand for development, in particular land for housing, in areas served by existing infrastructure and services. Because City General Plan Land Use Designations alone change the preferences of individual property owners or their desired timing to develop their land, the City is proposing to expand its Sphere of Influence to add additional land for potential future annexation, as needed. The City's intent is to plan this additional land for residential, industrial, and public facility development, increasing the available supply of residential lands in particular, to increase the likelihood that interested developers can find willing landowners to provide new housing units to accommodate growth. In addition, the General Plan includes programs to limit the potential for leapfrog development and to ensure that growth occurs in a logical manner.

Given that there are no population projections available for cities, the countywide population projection suggests little or no growth, there are no strong indicators of demographic or economic change in the City of Willits, The City of Willits has determined that continuing to use 7,500 persons as the potential total City population at the end of the 20-year planning period, or 2043. The City feels that is an appropriate and conservative approach to projecting buildout population at the end of the 20-year planning period for purposes of the Land Use Element Update. The current City population is similar to the 1992 population and a buildout population of 7,500 persons is commensurate with the population used in the planning for City infrastructure, most notably the wastewater treatment system, and planning for the City's street network were based on this population projection.

This Draft Programmatic Environment Impact Report evaluates the impacts associated with the City's projected growth the growth during the planning period, a total population of 7,500 in 2043. The PEIR does not analyze buildout of all allocated land use within the City and its proposed Sphere of Influence, because based upon foreseeable population trends, buildout of all land uses is highly speculative and is not projected to occur within the next 100 years. However, the impacts of Proposed Land Use Change Areas and Proposed Sphere of Influence Areas will be analyzed, as appropriate within each impact topic.

EMPLOYMENT AND THE ECONOMY

The City of Willits 2019 Housing Element presented a table (Table 2: Employment by Industry, 2010–2016) showing employment by industry sector for the residents of Willits, comparing the year 2010 to 2016. This table showed a decline in the total number of employed persons between 2010 and 2016 and the most recent Census data shows that this decline has been reversed. The 2020 data indicates that the proportion of residents employed in the construction industry, retail trades, transportation, warehousing and utilities, and educational services, health care, and social assistance is increasing, but

of those only employment in transportation, warehousing, and utilities or retail trade is increasing in absolute numbers.

Table 2-7, City of Willits Employment by Sector

Employment Sector	Number of Jobs 2010[1]	Number of Jobs 2016[1]	Number of Jobs 2020[2]	% Change 2016-2020	% of Jobs 2016
Total Employed	**2,124**	**1,717**	**1,932**	**13%**	**100%**
Agriculture, forestry, fishing and hunting, and mining	0	124	95	-23%	5%
Construction	82	13	79	508%	4%
Manufacturing	259	326	107	-67%	6%
Wholesale trade	52	79	14	-82%	1%
Retail trade	253	187	263	41%	14%
Transportation and warehousing, and utilities	37	22	130	491%	7%
Information	0	35	65	86%	3%
Finance and insurance, and real estate and rental and leasing	67	54	73	35%	4%
Professional, scientific, and management, and administrative and waste management services	258	35	121	246%	6%
Educational services, and health care and social assistance	637	519	596	15%	31%
Arts, entertainment, and recreation, and accommodation and food services	259	148	158	7%	8%
Other services, except public administration	35	83	59	-29%	3%
Public administration	185	92	172	87%	9%

1. City of Willits 2019 Housing Element Table 2: Employment by Industry, 2010–2016.
2. American Community Survey, 2020.

There is no easily accessible source of information regarding employment within the City of Willits. City of Willits 2019 Housing Element Table 5, Largest Employers, identifies the largest employers within the Willits city boundaries based on information from the Willits Chamber of Commerce. Based on Table 5, some of the largest employers are the F.R. Howard Memorial Hospital (387 employees), Willits Unified School District (285 employees), and Metal/fx (the largest private sector employer with 128 employees). ESRI, Inc., prepares proprietary estimates of employment for any geography. This source indicates that there are a total of 528 employers, employing 4,124 people, however data from this source does not appear fully accurate and cannot be used to compare to Table 5.

The Employment Development Department, Labor Market Information Division (LMID) prepares Industry Employment Projections (current projection period is 2018 to 2028) for counties in California. LMID aggregates Mendocino County as part of the North Coast Region together with Del Norte, Humboldt, and Lake Counties. These projections suggest that total employment will increase by four percent within the region during the projection period and that the Educational Services (Private), Health Care, and Social Assistance, government, leisure and hospitality, and construction industries will drive these employment gains. Caltrans also prepares county-level economic forecasts for transportation planning purposes. The 2021 forecast projects appreciable increases in health and education, government, and leisure as a

proportion of total county employment and reductions in proportion of manufacturing and farm employment between 2020 and 2050.

The California Department of Tax and Fee Administration provides taxable transaction datasets for cities and counties in the state. Based on these data, the average annual growth rate (AAGR) for sales between 2015 and 2021 in the City of Willits lags the state of California and total Mendocino County sales. The City of Willits share of countywide sales in most business types declined during this period, in particular, Gasoline Stations declined from almost 22 percent of countywide sales to 14 percent, while Building Material and Garden Equipment and Supplies Dealers increased from 11 to 12 percent after peaking at 14 percent.

ENVIRONMENT AND INFRASTRUCTURE

Historical and Natural Setting

The City of Willits is in the Little Lake Valley surrounded by secondary forest consisting of tan oak, madrone, Douglas fir, and redwood trees within the Pacific Coast Range known as the “Gateway to the Redwoods” and the “Heart of Mendocino County”. The City was originally inhabited by the Pomo tribe of Native Americans, and later settled by pioneering ranchers in the 1850s. Today, Willits is one of the largest population centers in Mendocino County and is surrounded by agricultural lands, rural residential, forestlands, and open rangelands.

Natural Resources

The City of Willits and the Little Lake Valley and the surrounding foothills consist of a wide variety of topographic, hydrologic, and edaphic (soil) conditions, which supports a number of habitat types and provide habitat for a diversity of biological communities. The natural plant communities and wildlife habitats of the valley bottom include extensive wetland habitats, including wet meadows, marshes, and riparian woodlands; however, much of the wetland vegetation has been altered by farming and urban development. Large expanses of these habitat types are unusual in the North Coast Range because wide graben-type valleys, like Little Lake Valley, with poor drainage are uncommon. Because they are regionally uncommon, these extensive wetland and riparian habitats in the project area have become particularly important to migrating waterfowl and other wildlife species. In the hills surrounding Little Lake Valley, the vegetation is typical of the grasslands, woodlands, and forests of the North Coast Range and is relatively undisturbed. Hay and residential meadows are disturbed or cultivated communities, portions which are jurisdictional wetlands that are common in Willits and the Little Lake Valley. These provide marginal wetland functions and values. Oak woodlands are common in and around the City and provide important biological and aesthetic values, including food sources, roosting and nesting sites for wildlife, habitat diversity, and visual diversity.

Hazards

Due to the City’s location within a seismically active region and proximity to numerous active faults, Willits is prone to seismic hazards. The Maacama Fault, which is considered an active fault by the California Geological Survey, passes through the center of the City. The Maacama fault is a fault that experiences fault creep of approximately 8 millimeters per year and theorized to be the northernmost segment of the Hayward Fault subsystem of the San Andreas Fault zone, which is the dominant fault along the western margin of California. Other hazards that affect the City of Willits include flood plains that are associated with the larger streams that pass through the City and dam inundation areas associated with Morris and Brooktrails Dams and areas of steep slopes associated with hills on the west side of the City.

Climate Vulnerability

Projections of future conditions for the City of Willits due to climate change from the f the Mendocino County Multi-Jurisdictional Hazard Mitigation Plan 2020 Update include increased temperatures, increased extreme heat days, greater amounts of precipitation, more extreme rainfall events, longer droughts, increased wildfire incidents and severity, and prolonged power outages. Increasing temperatures associated with climate change act as a hazard multiplier. These increases are also anticipated to lead to increases in the number of extreme heat days and the incidence and duration of droughts. While temperatures are anticipated to increase in the coming decades, climate change projections also suggest that annual mean precipitation may increase, which could increase flooding. With changes in future precipitation, it is expected that changes to local vegetation may occur, which could impact drainages and increase the need for wildfire management activities.

Increased rainfall could increase the amount of flooding within the community or introduce flooding into areas that have not experienced flooding before. One of the most vulnerable flooding locations is the City's wastewater treatment plant. This location is already prone to flooding and would experience greater flooding if projected precipitation increases occur. With greater and more intense precipitation, the City could also experience an increase in landslides/mudslides. Intense precipitation events could de-stabilize hillsides and drainages resulting in more landslides/mudslides and/or erosion along stream courses, impacting neighboring properties/structures. Precipitation increases within the area will lead to increased amounts of vegetation growth and changes to vegetation density and potential changes to dominant plant species. These vegetation changes could exacerbate wildfire hazards.

Water Supply

The City owns, operates, and maintains a public water system that includes surface water reservoirs, a groundwater well, a surface water treatment plant (WTP), a groundwater treatment plant (GWTP), and associated distribution infrastructure. The primary potable water supply source for the City is surface water from the Centennial and Morris Reservoirs, with groundwater available as a back-up supply to be used in accordance with the City of Willits Groundwater Operational Use Plan (adopted 2022). These sources are described in further detail below. The City's water supply sources and water treatment plants, along with other public water purveyors in the surrounding area.

In response to the severe drought conditions from 2013 to 2014 that prompted declaration of a Stage 5 Water emergency, the City developed the Elias Replacement Well (ERW) and GWTP to supplement the surface water sources. The ERW is within the Little Lake Valley groundwater basin, is approximately 200 feet deep, and currently has a 30 horsepower (hp) pump that produces approximately 330 gallons per minute (GPM). The GWTP, which treats groundwater from the ERW, is located off Sewer Plant Road. The extracted groundwater is relatively high in manganese and iron. To address this, the GWTP utilizes filtration and chlorine addition to oxidize the manganese prior to filtration and to provide disinfection residual (LACO, 2019).

The City water system service area includes the incorporated City and certain surrounding areas, serving a population of 5,500 to 6,600 people (LACO, 2019). This population is served through a total of 2,412 connections, including 1,909 single-family residential (SFR) connections, 503 non-SFR/non-fire protection connections, and 55 fire connections that provide fire protection for commercial and industrial buildings (City of Willits, 2023a). This includes 437 out-of-agency services (OAS) connections outside the City limits. These OAS connections serve individual homeowners and groups of homeowners from master meters located at the City limits. Pursuant to an agreement signed in November 1995, the City provides water and wastewater services to the Sherwood Valley Band of Pomo Indians Rancheria (Rancheria) located southwest of the City limits, which includes residential units, a community center,

and the Sherwood Valley Casino. Through this agreement, the City provides for the water needs of up to 50 residential units, or functional equivalent (LAFCo, 2019).

Wastewater

The City owns, operates, and maintains a public wastewater system that includes wastewater collection infrastructure, a wastewater treatment plant (WWTP), and water reclamation facilities. This section describes the existing conditions of the wastewater collection and treatment system. The City wastewater system serves an estimated population of 8,600 people, including approximately 5,000 people in the incorporated City, 3,300 people in the Brooktrails Township Community Services District (BTCSD), 200 people in the Meadowbrook Manor County Sanitation District (MMCSD), and 100 people at the Rancheria. The BTCSD, has approximately 1,560 OAS connections that are served by agreement, with the City having provided wastewater treatment and disposal services to the BTCSD since 1967, Meadowbrook since 1956, and the Rancheria since 1989 (LAFCo, 2019; City of Willits, 2016). The existing City of Willits Sphere of Influence contains a portion of the MMCSD district boundary.

The City's wastewater collection system consists of 22 miles of gravity-fed sewer mains ranging in diameter from 4 to 24 inches, one (1) lift station, and 450 manholes (LAFCo, 2019). The WWTP is located in the northeast corner of the City, a portion of which is in the unincorporated area, and was constructed in 1975 as a secondary aeration treatment plant and has since gone through several upgrades. In response to a cease-and-desist order issued by the Regional Water Quality Control Board (RWQCB), the City completed Stage 2 of a $25.6 million wastewater treatment plant upgrade project. The proposed upgrades to the existing wastewater treatment plant are designed to correct deficiencies, provide redundancy and improved reliability, and meet the regulatory requirements of the RWQCB. The improvements are not designed to increase plant capacity, which is currently deemed adequate to meet existing and projected needs. In accordance with the City's Waste Discharge Requirements and Master Recycling Permit (Order No. R1-2021-0021) issued under National Pollutant Discharge Elimination System (NPDES) permit No. CA0023060 by the North Coast Regional Water Quality Control Board (Regional Board), treated effluent is discharged to Outlet Creek (downstream of the confluence of Broaddus Creek and Baechtel Creek) from October 1 through May 14. From May 15 through September 30, treated effluent is recycled as irrigation water on the surrounding pasture lands.

Storm Drainage

The City maintains a storm drain system that consists of approximately 5.6 miles of storm drain lines as well as open channels and ditches. These facilities are part of an integrated system of roadside gutters, drainage ditches, and storm drain lines that are used to collect and convey the stormwater runoff from the City to the system's discharge points in Broaddus, Mill, Baechtel and Haehl Creeks. These creeks and all other drainages in the Little Lake Valley ultimately convey stormwater to Outlet Creek, which leaves the valley at the north end and is a tributary to the Main Fork of the Eel River. Unlike portion of the unincorporated area of Mendocino County, the is not subject to the Federal Stormwater Phase II Final Rule (Phase II Rule), the rule only applies to operators of small municipal separate storm sewers (MS4s), in 2009, the City developed Low Impact Design (LID) Guidelines for Stormwater Management for new developments and new stormwater infrastructure.

Transportation

Major state routes in the City of Willits include portions of U.S. 101 on the eastern edge of the City and State Route 20, which serves as South Main Street and turns west towards the coast in the Center of the City. Major City of Willits Streets include Main Street, former U.S. 101, Baechtel Road, Commercial Street, and East Valley Street. Beginning at the Evergreen Village Shopping Center, north State Route 20 becomes a five-lane roadway with two travel lanes in each direction and a two-way left turn lane in

the center. Main Street is currently a three-lane street with one travel lane in each direction and a two-way left turn lane in the center for much of its length. Main Street was recently improved to implement the Willits Main Street Corridor Enhancement Plan (2016), which includes wider sidewalks, higher visibility crosswalks with better lighting, sidewalk extensions, bulb-outs (curb extensions). All other streets are typically one-lane in each direction. The following table shows streets in the City of Willits by California Road System functional classification.

Table 2-8 City of Willits Streets	
Functional Classification	**Miles**
Other Principal Arterial	2.17
Minor Arterial	5.54
Major Collector	6.41
Local	17.49
Total	**31.61**

Main Street, beginning at Sherwood Road, has a striped Class II bike path on both sides of the street. Commercial Street and Baechtel Road also contain Class II and III bike markings or signs along the street along some or most of their length within the City. As part of the Great Redwood Trail, a multi-use trail within the former North Coast Rail Authority Right of Way traversing Marin, Sonoma, Mendocino, Trinity, and Humboldt Counties, the City if Willits is implementing the Willits Rail Trail project, which is a 1.6-mile Class I separated bicycle and pedestrian pathway that will be built within the rail corridor in the City of Willits.

The predominant pedestrian facility within Willits is sidewalks. There are 23.4 miles of sidewalks adjacent parking or vehicle travel lanes along streets and 6.4 miles of no shoulder roads or sidewalk gaps.

Parks and Recreation

Parks and recreation opportunities and open space areas are important elements of the urban environment. The City of Willits is located within Mendocino County, which has a wealth of outdoor recreational opportunities. Based on the National Recreation and Park Association (NRPA) Park Classification System, the City operates and maintains a park system that includes eleven facilities, including: three community parks (City Ball Fields, Recreation Grove Park, and the Carnival Grounds containing the baseball fields adjacent to the Willits Rodeo Grounds; four neighborhood parks ("Bud" Snider Park, Babcock Park, Haehl Creek Subdivision Park, and Hwy 20 Park); one natural area (linear park) (Haehl Creek Park); and three special use facilities (Frank Grasse Dog Park, Willits Skate Park, and Willits City Pool). The following is a table providing additional descriptive information about City of Willits Parks

Table 2-9, Willits Parks		
Park Type and Name	**General Description of Facilities**	**Acres**
Total Community Park Acres		**18.99**
City Ball Fields	Soccer field and two baseball fields	8.61
Recreation Grove Park	Picnic, playgrounds, bathroom, basketball court	4.96
Carnival Grounds	Two baseball fields	5.43
Total Neighborhood Acres		**3.74**
Willits City ("Bud" Snider) Park	Plaza, playground and lawn area	1.75
Babcock Park	Lawn, passive recreation, fountain	0.39
Haehl Creek Subdivision Park	Lawn area, passive recreation	0.46

Table 2-9, Willits Parks		
Park Type and Name	**General Description of Facilities**	**Acres**
Hwy 20 Park	Lawn area, passive recreation	1.13
Total (Linear Park) Natural Area Acres		**13.07**
Haehl Creek Park	Open space, passive recreation, walk/bike trails	13.07
Total Special Use Acres		**2.54**
Frank Grasse Dog Park	Dog park	0.66
Willits City Pool	Willits High School Pool - Summer Use via MOU	0.46
Willits Skate Park	Skate park	1.42
Grand Total		**38.34**

In addition, the City operates the Willits Community Center, which is used for recreation programs and public and private events, and owns the land that contains the Willits Library, the Mendocino County Museum and Roots of Motive Power, and the Willits Rodeo Ground, primarily for use by Frontier Days. In addition to City owned parks and other recreational facilities, there are three school sites with fields and play structures that are informally available to residents and may be used as neighborhood parks.

The Willits High School pool is available to the public during the summer months (June to August) through City funding, and during September and October part-time use, though an agreement with Willits Unified School District for recreation purposes. Pool activities include swimming lessons and water aerobics. A fee is charged to the public and used to partially offset the maintenance, utilities, and other costs of operating the pool. A number of seasonal employees are hired each year, including a Pool Manager, Assistant Pool Manager, Swim Instructors, and Lifeguards, to staff and supervise the use of the pool. Swimming Pool Operations are managed through the City Managers' office. Since 2012 the pool has been open for additional hours for private swim lessons and water aerobics.

Most of the City park facilities, especially those parks with improved recreational facilities, are located along East Commercial Street in the north/east portion of the City. The Highway 20 linear park and Babcock Park, which do not contain active recreation improvements, are located in the central portion of the City. In addition to two neighborhood parks, Baechtel Grove Middle School, Blosser Lane Elementary School, and the Willits Kids Club are located in the central portion of the City of Willits. Haehl Creek Park, which is comprised of approximately 0.5 miles of the Haehl Creek riparian area contains walking and biking trails, and the Haehl Creek Subdivision Park, containing a lawn area, area located in the southern portion of the City.

Fire Protection

The City of Willits is within the Little Lake Fire Protection District (FPD), which is a single-purpose special district governed by an independently elected five-member Board of Directors. The Little Lake FPD provides full-service community fire protection services, which generally includes fire prevention and suppression, medical/rescue/extrication, and hazardous materials responses.

The Little Lake FPD is 238 square miles in area. The Little Lake FPD is adjacent to and west of LLFPD is the Brooktrails Township Community Services District (which provides fire protection services), the Long Valley Fire Protection District to the northwest; the Potter Valley Community Services District (which provides fire protection services) to the southeast, and the Redwood Valley-Calpella Fire Protection District to the south. Fire departments in Mendocino County respond, as available, to the needs of nearby fire departments through a countywide mutual aid agreement.

The Little Lake FPD operates from two fire stations: Main Station (74 E. Commercial Street, Willits), which is staffed by the Fire Chief, duty and administrative staff and contains initial response apparatus, and Substation (1575 Baechtel Road, Willits), which is not staffed and contains apparatus and training facilities.

Public Utilities

Pacific Gas and Electric (PG&E) is the provider of electrical natural gas services within the City of Willits. AT&T is the primary telephone service provider and also provides internet communications services. Cable television is provided by Xfinnity/Comcast,

2.5 Features of the Land Use Element Update

Land Use Element

The City has prepared a draft General Plan Land Use Element update, which was last comprehensively adopted in 1992. Since then, the City's land use needs have changed due to demographic and economic conditions and updates are required to comply with state guidelines and policies. The Land Use Element is also proposed to define a Planning Area outside City boundaries that includes land that bear a relationship to the City, which can be used to communicate City objectives and concerns for surrounding lands under the jurisdiction of the County, and to seek approval from the Local Agency Formation Commission to expand the City Sphere of Influence to support potential future annexations.

The proposed Land Use Element provides diagrams, policies, and programs for the distribution, location and extent of uses of land for housing, business, industry, natural resources, open space, recreation, and other uses. The Element is intended to guide the pattern of development for the City, providing a long-range context for decision making regarding zoning, subdivision, and public facilities. These land use policies guide growth and the development and use of land for a planning period of 20 years or more and direct regular periodic updates to ensure that policies meet the planning needs of the City and that demographic, land use, and service information remains current. Although the Land Use Element Update has a 20 or more-year planning horizon, the Land Use Diagram identifies more than enough allocated land use to meet projected demands for residential, commercial, and industrial uses during this period.

Land Use Element Update Process

Agency Input. After initiating the project in 2022, the City of Willet's Community Development Department established an Advisory Committee consist of two City Council members; staff from Community Development, Public Works, and Police; representatives from the Sherwood Valley Band of Pomo, Willits Unified School District, Little Lake Fire Protection District, Brooktrails Township CSD, the Chamber of Commerce, Adventist Health Howard Memorial Hospital; and representatives of businesses such as LEEF Organics, METAL fx, and a local building contractor and held a series of meetings to provide guidance on this project. Given that the project involves planning for the expansion of the City SOI, City staff also closely coordinated with Mendocino County and the Mendocino LAFCo.

A Notice of Preparation (NOP) was issued on March 10th to inform agencies and interested parties that a Programmatic Environmental Impact Report (Program EIR) will be prepared to evaluate the environmental effects associated with the proposed General Plan Land Use Element and Sphere of Influence (SOI) Updates. In addition, a project webpage is available at https://willitslanduseupdate.com/.

Community Input. On March 29th, a Community Open House was held at the City community center with two sessions: 11:30 am to 2:00 pm and 5:30 pm to 8:00 pm. At the Open House, posters displayed the overall concepts and questions regarding the focus areas of this planning effort (a City of Willits Planning Area outside City limits and potential City growth areas; potential land use changes with the

City; making more efficient use of land within the City and providing zoning flexibility; protecting important natural resources and conserving energy; and parks and recreational opportunities) and staff and consultants were available to answer questions and gather input. Members of the public were encouraged to write comments on post-it notes and place them on each poster. The comments have been compiled and are helping to guide policy and mapping recommendations.

A web-based survey was available on the project webpage in English and Spanish, which will also be used provide essential guidance on policy and mapping recommendations. As identifying land use/zoning changes within the City that can create new housing or business opportunities is an objective of the project, the project webpage also contains a form where property owners can submit suggested changes that could potentially be taken up as part of this project if they are in the public interest (e.g., result in additional housing/economic development opportunities). The survey closed on May 1st and a summary will be provided as part of the presentation.

The City also provided a web-based form for property owners to submit requested changes to their property that could potentially be taken up as part of this project if they are in the public interest.

The City Council, which serves as the Planning Commission for the City of Willits, held public workshops on the Land Use Element on May 10th and June 21st to discuss and gather public input on policy focus areas and proposed land use changes.

Proposed Land Use Element Update

The proposed Project is a comprehensive update to the Land Use Element. Through the public process the City identified a series of policy focus areas to guide the City's planning to update the General Plan Land Use Element to accommodate desired growth, address community needs, protect natural resources, and meet changes in State law – especially relating to housing – and to update the City's Sphere of Influence to provide new housing opportunities, streamline the approval process, and accelerate housing development. The policy focus areas contributed to the development of the City's objectives for the Land Use Element, listed as follows:

1. Plan for a range of potential population growth levels within the City.
2. Facilitate infill development and commercial vitality.
3. Define an expanded Sphere of Influence that includes appropriate areas around the City for potential future residential development to help ensure an adequate City supply of developable land.
4. Ensure adequate public utilities, services, infrastructure, and a street network that supports all users and plan for phased improvements to support existing, and new land planned for residential and commercial development.
5. Plan new and sustain existing parks and recreation facilities for the entire community, especially underserved areas.
6. Facilitate the vitality of Downtown and South Main Street by improving important City gateways and by defining flexible land use regulations to encourage adaptive re-use of existing structures and design standards that improve the streetscape and create a comfortable atmosphere for walking, biking, outdoor seating and gathering.
7. Define a Land Use Map and policy that minimizes the number of non-conforming uses and protects existing communities from incompatible uses, reduces energy consumption, and vehicle miles travelled.

8. Streamline the permitting process and maximize opportunities for housing development to address the local, regional and statewide housing shortage, especially infill development within current city limits.
9. Protect and conserve natural resources and avoid hazards.

The proposed amendments to the Land Use Element can be grouped into the following themes.

Expand the Land Supply for Housing of All Types

Conscious of the low levels of growth projected for the county but the need for housing locally, the City is seeking to create a supply of land that is responsive to the levels of demand that may occur during the planning period. The City is adding a mixed-use land use designation to accommodate demand for housing and commercial development and to accommodate growth in areas served by existing infrastructure and services. Because City General Plan Land Use Designations alone cannot determine the preferences of individual property owners or their desired timing to develop their land, the City is proposing to expand its Sphere of Influence to plan land for potential future annexation. The City's intent is to plan this additional land for residential, industrial, and public facility development, increasing the available supply of residential lands in particular to increase the likelihood that interested developers can find willing landowners to build housing units to accommodate growth. The General Plan includes programs to limit the potential for leapfrog development and to ensure that growth occurs in a logical manner.

The proposed land supply is intended to accommodate growth up to 7,500. As described in the discussion of Population and Housing above, the City of Willits has selected 7,500 persons as the potential total City population at the end of the 20-year planning period, or 2043. This population level is commensurate with the population used in the planning for City infrastructure, most notably the wastewater treatment system, and planning for the City's street network were based on this population projection. This Draft Programmatic Environment Impact Report evaluates the impacts associated with the City's projected growth the growth during the planning period, a total population of 7,500 in 2043. The PEIR does not analyze buildout of all allocated land use within the City and its proposed Sphere of Influence, because based upon foreseeable population trends, buildout of all land uses is highly speculative and is not projected to occur within the next 100 years. This PEIR assumes that housing growth could occur anywhere within the City or proposed Sphere of Influence. The Land Use Element includes a program to track housing and population growth as part of the annual General Plan report and inform the City Council of the potential need to update the Land Use Element in the event that the total population of 7,500 may be exceeded.

The Land Use Element includes a series of policies that are intended to encourage incremental, infill development (LU-2.2, Infill Development) which the City feels represents the best opportunity to support affordable housing and employment development, and to reduce greenhouse emissions. Encourage incremental development of vacant and underutilized infill areas that are appropriately scaled and that enhances existing neighborhoods within the City. The Land Use Element also includes a program to monitor the land inventory and periodically reach out to landowners and seek their: (1) level of interest in development, (2) concerns regarding developing; and (3) potential constraints affecting development or landowner needs to proceed with development. As needed, during the annual General Plan progress report, provide the City Council with a report on the inventory of vacant and underutilized land planned and zoned for residential use and the potential need for changes to General Plan policy or Zoning standards, annexations, or other City programs that may be needed to facilitate development consistent with the General Plan.

Figure 2-4 Proposed Land Use Map (Current City Boundary)

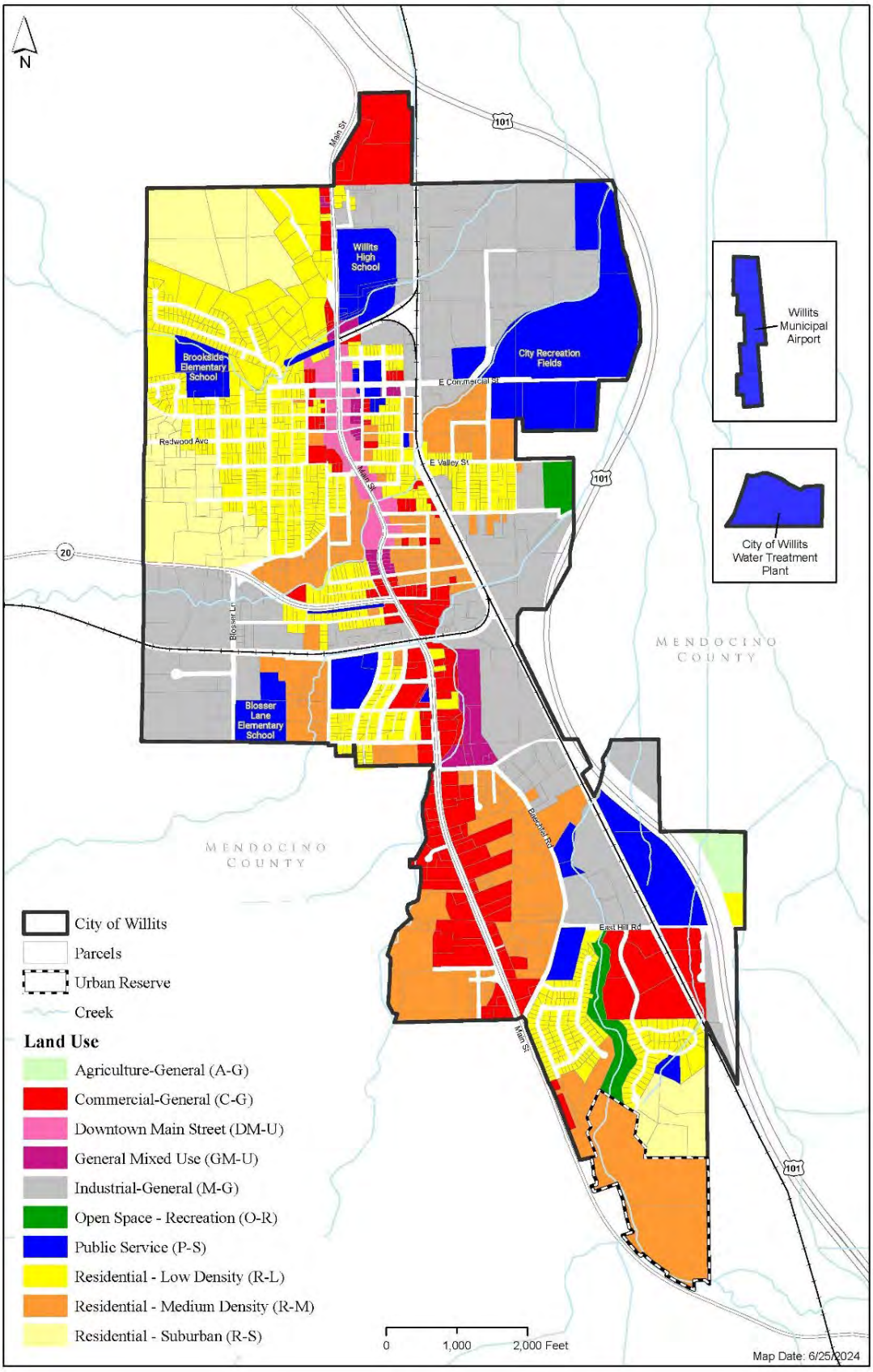
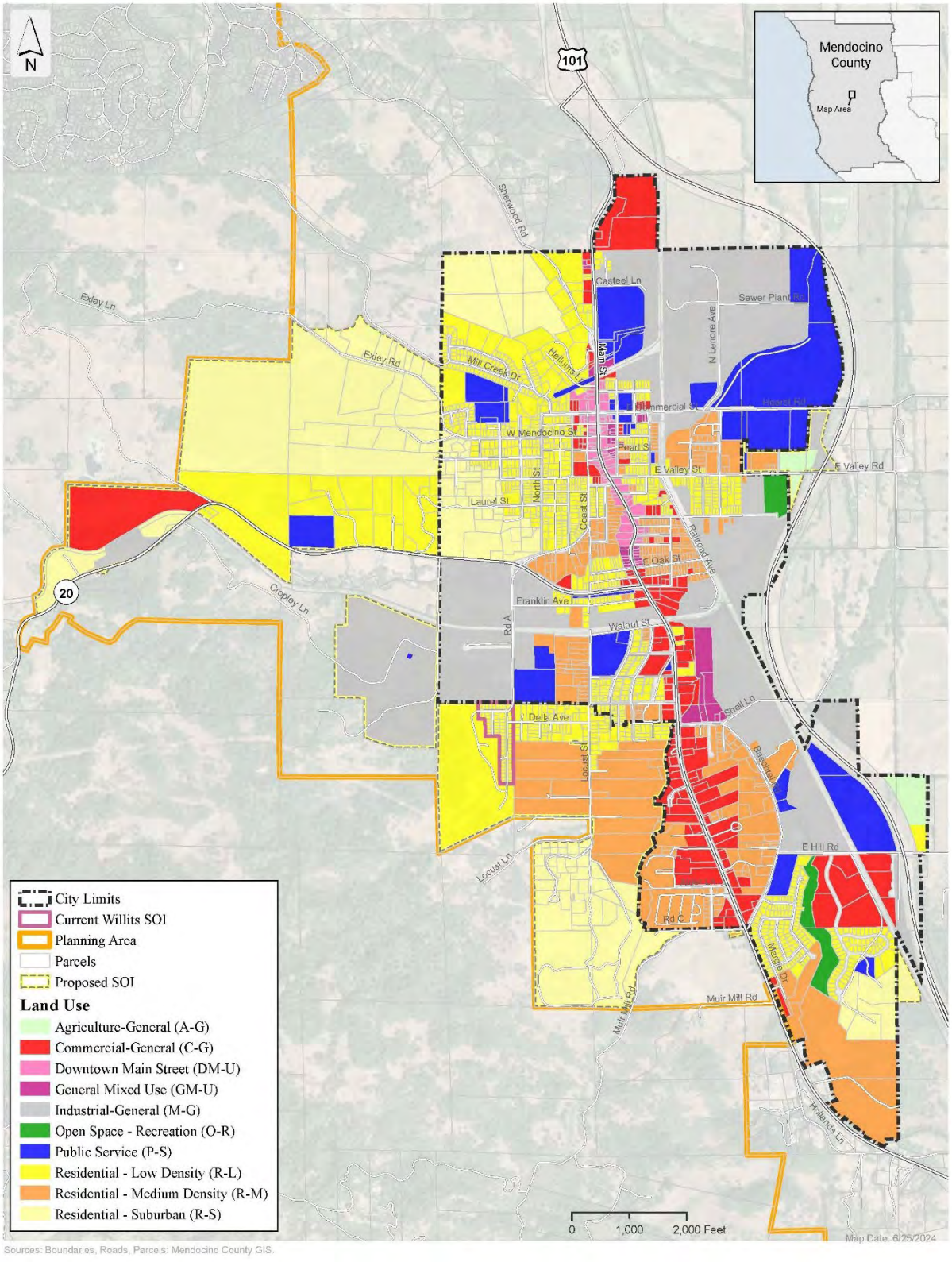


Figure 2-5 Proposed Land Use Map (Proposed Sphere of Influence)



Following the adoption of the Land Use Element update, including the adoption of the policies and land use designations associated with the proposed SOI (see Proposed SOI Additions), the City of Willits intends to prepare and submit an application to the Mendocino LAFCo to amend the City's SOI. This PEIR addresses the potentially significant adverse environmental impacts that may be directly or indirectly associated with the expansion of the existing City of Willits SOI boundary. There are no specific land use entitlements proposed at this time in conjunction with the Land Use Element and proposed SOI nor is physical development proposed in conjunction with the Land Use Element and proposed SOI.

LAFCo's powers are set forth in the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, Government Code 56000 and following. Each LAFCo is required to exercise its powers in a manner that provides planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open space lands within those patterns. LAFCo policies discourage urban sprawl and the encourage the orderly expansion of local agency boundaries based on local conditions and circumstances.

Specific issues of importance to LAFCo include:

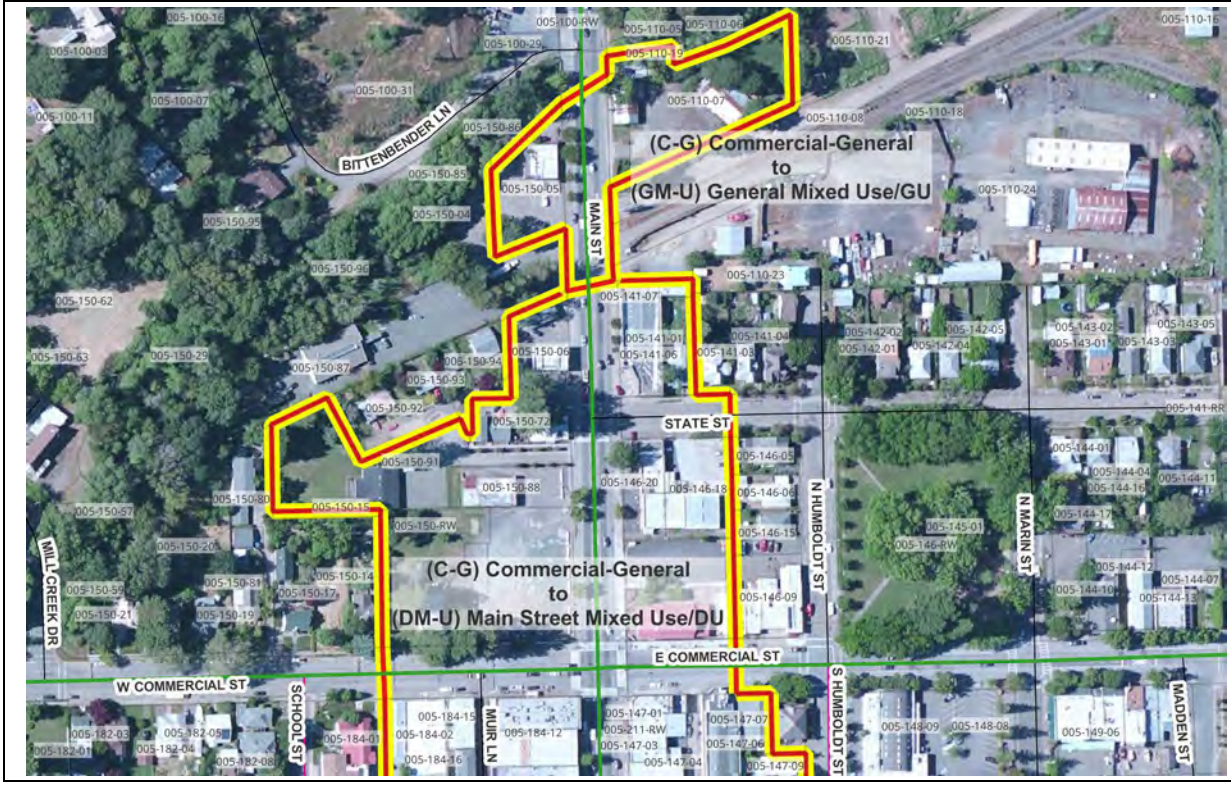
- Encourage orderly growth and development patterns (Section 56001).
- Discourage urban sprawl, preserve open-space and prime agricultural lands, efficiently provide government services, and encourage the orderly formation and development of local agencies based upon local conditions and circumstances (Section 56301).
- Guide development away from open space and prime agricultural land uses unless such action would not promote planned, orderly, and efficient development (Section 56377).

Proposed Land Use Changes within the City

The following is a listing of proposed land use changes within the City intended to increase the supply of land for residential and mixed-use development.

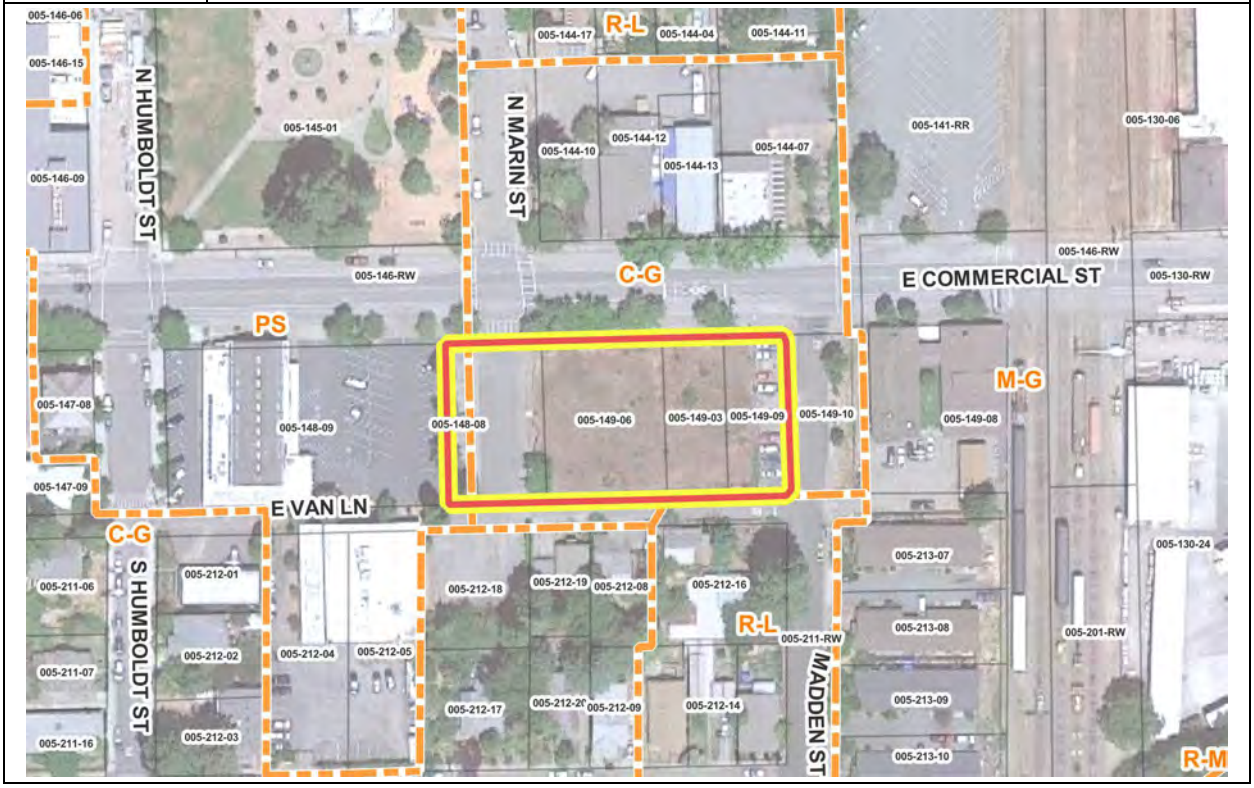
North Main at Commercial Street [Commercial-General - to - General Street Mixed Use and Main Street Mixed Use]

Description	Mixed-Use to allow standalone commercial or residential on the property with only a ministerial permit. Additionally, within the proposed Mixed-Use Zoning designation, the requestor could benefit from parking requirement reduction, building height extension, and other considerations
APNs / Area	14 APNs; 3 vacant / 1.0 acres total; the remainder are partly or fully developed
Ownership	Many properties under individual ownership
Proximity & Access	Main Street and Commercial Street adjacent to downtown. Very walkable
Topography & Constraints	Flat; no hazards
Utilities	City water service, hydrants, and wastewater is provided and located within "Main pressure zone," which likely has adequate storage.
Land Use	Current: Commercial – General / Proposed: "General Mixed Use"
Development Potential	30 dwelling units per acre and building three area three-times the lot area, subject to height limits and other development standards



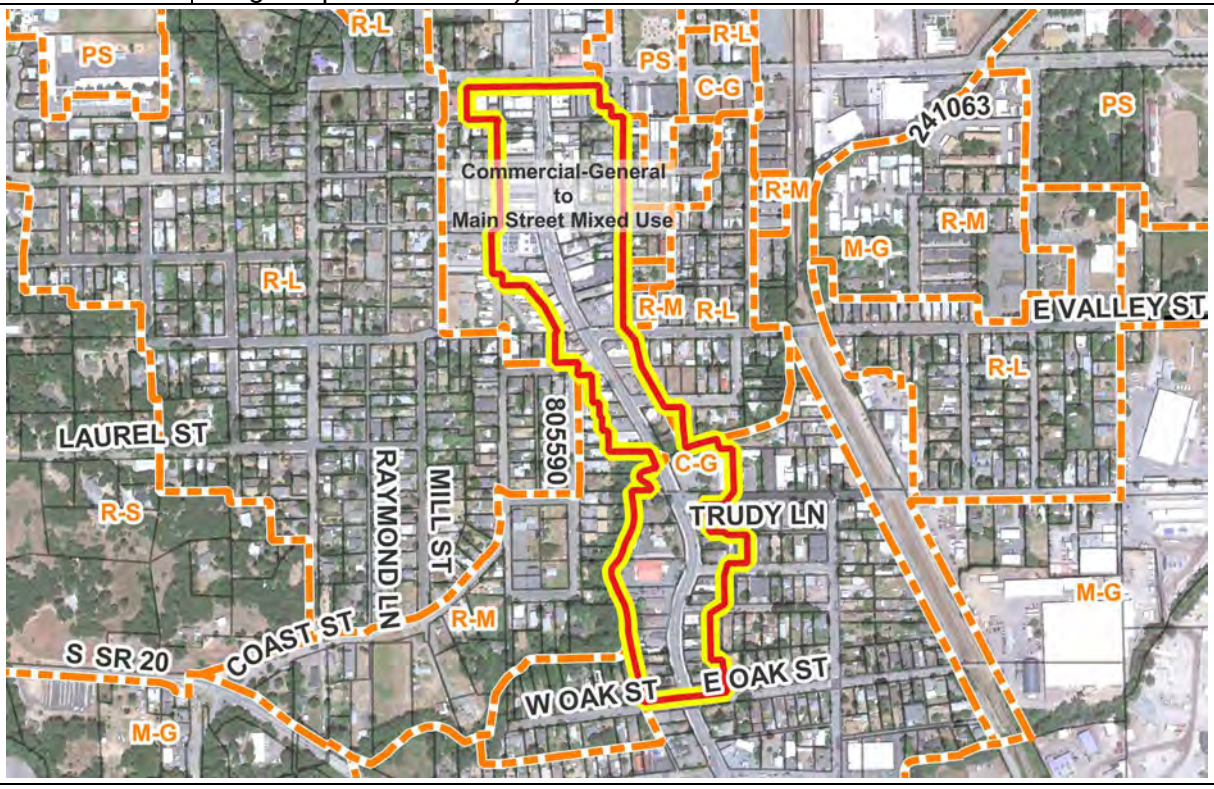
Goines, Matt East - Commercial Street [Commercial-General - to - General Street Mixed Use]

Request	Mixed-Use to allow standalone commercial or residential on the property with only a ministerial permit. Additionally, within the proposed Mixed-Use Zoning designation, the requestor would like to see a parking requirement reduction, building height extension, and other considerations for APNs 005-148-08; 005-149-03; 005-149-06; & 005-149-09
APNs / Area	4 APNs; all vacant / 0.87 acres total; 0.62 contiguous and developable (remainder between North Marin Street and City Hall parking lot likely only useable as parking)
Ownership	Single owner motivated to develop
Proximity & Access	East Commercial Street adjacent to City Hall. Very walkable
Topography & Constraints	Flat; no hazards
Utilities	City water service, hydrants, and wastewater is provided and located within "Main pressure zone," which likely has adequate storage.
Land Use	Current: Commercial – General / Proposed: “Main Street Mixed Use” and “General Mixed Use”
Development Potential	Based on 30 dwelling units per acre, maximum development potential of 18 units



Downtown Main Street [Commercial-General - to - Main Street Mixed Use]

Description	The entire area is currently planned Commercial-General. Apply a new "Main Street Mixed Use" Land use Designation to parcels primarily fronting on Main Street between Commercial Street and Oak Street to stimulate the adaptive reuse of existing buildings and the development of new pedestrian-oriented, mixed-use buildings. Allowable uses could include retail, administrative office, general commercial, and residential uses that are ideally located above or behind non-residential uses.
APNs / Area	96 APNs; 6 vacant / 19.5 acres total; less than one acre vacant & developable
Ownership	various
Proximity & Access	The historic downtown area of Willits, centrally located with the highest level of access and mobility within the City
Topography & Constraints	Flat; seismic hazards, limited Broaddus Creek stream and riparian area
Land Use	Current: Commercial – General / Proposed: "Main Street Mixed Use"
Zone	Current: Community Commercial / Proposed: "Main Street Mixed Use"
Utilities	City water service, hydrants, and wastewater is provided and located within "Main pressure zone," which likely has adequate storage.
Development Potential	Limited new development potential. Adaptive reuse could occur if barriers were reduced or eliminated (such as on-site parking requirements and a limited range of permitted uses)



Former Hospital Site [Public-Service - to - Commercial-General]

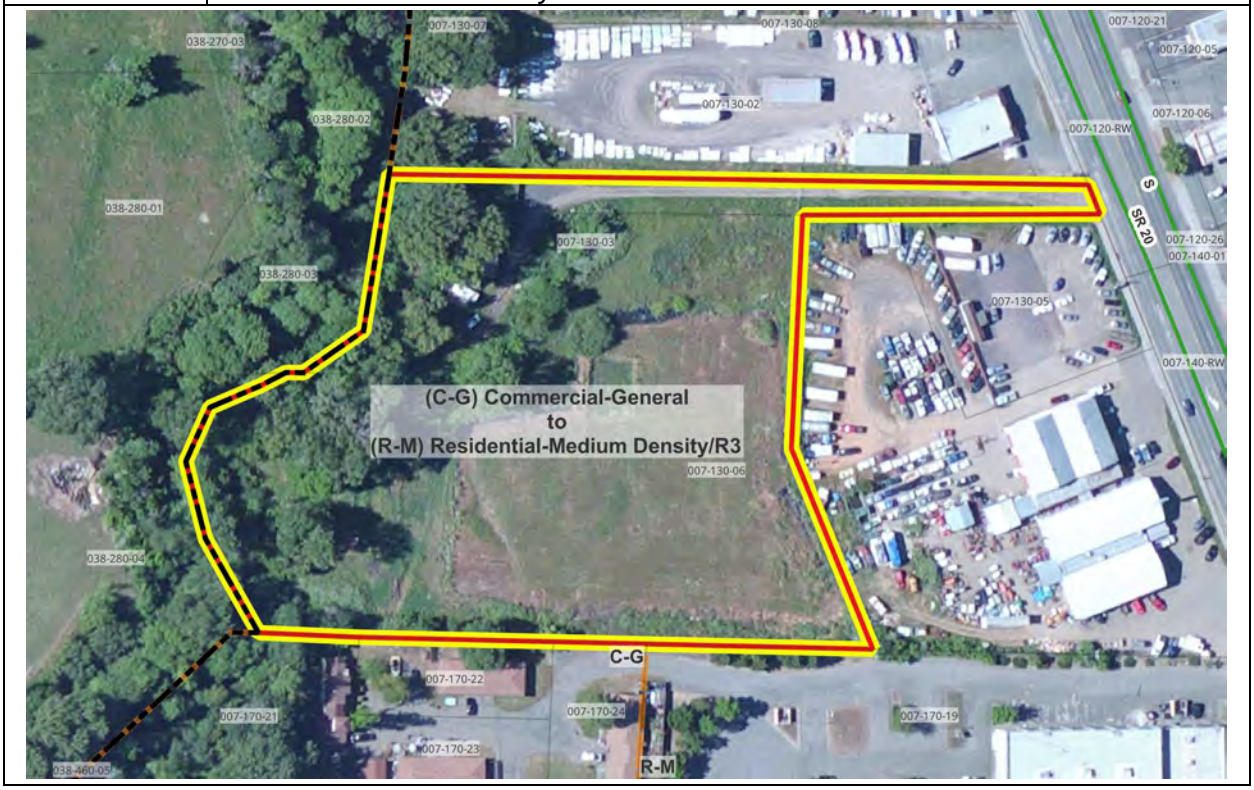
Description	This area is currently planned "Public-Service" and was the site of the hospital, prior to its moving across town, plus a doctor's office. Apply the "Commercial-General" Land Use Designation to the former hospital site and to the doctor's office.
APNs / Area	2 APNs; 1 vacant / 3.5 acres total; 2.9 acres vacant & developable
Ownership	Each property under individual ownership
Proximity & Access	All parcels are adjacent to South Main Street and located within a fine-grained street network, located near schools and services.
Topography & Constraints	Flat and gently sloped areas
Utilities	City water service, hydrants, and wastewater is provided and located within "Main pressure zone," which likely has adequate storage.
Land Use	Current: Public-Service / Proposed: "Commercial-General"
Development Potential	The vacant property proposed to be planned "Commercial-General" has substantial development potential and could accommodate additional medical/office related uses and/or a range of commercial uses

Baechtel Road [Industrial-General & Commercial-General - to - General Mixed Use]

Description	This area is currently planned "Industrial-General" and "Commercial-General" and are proposed to be planned for mixed uses. This is a part of the was the subject of the Baechtel Road Railroad Avenue Corridor Design Study in 2003, which was a study to evaluate the construction of a road which would connect Baechtel Road and Railroad Avenue and the infill development of a large area of unimproved land that would be integrated into a Citywide network, and provide a link connecting the housing, employment and recreational facilities on the east side of the City.
APNs / Area	9 APNs; 6 vacant / 15.1 acres total; 13.0 acres vacant & developable
Ownership	Each property under individual ownership
Proximity & Access	Parcels generally front along Beachtel Road and are reasonably close to schools and services.
Topography & Constraints	Flat and gently sloped areas
Utilities	City water service, hydrants, and wastewater is provided and located within "Main pressure zone," which likely has adequate storage.
Land Use	Current: "Industrial-General"/"Commercial-General" / Proposed: "General Mixed Use"
Development Potential	This area is proposed to be planned "General Mixed Use" has substantial residential and commercial development potential and could accommodate over 350 units at maximum density.

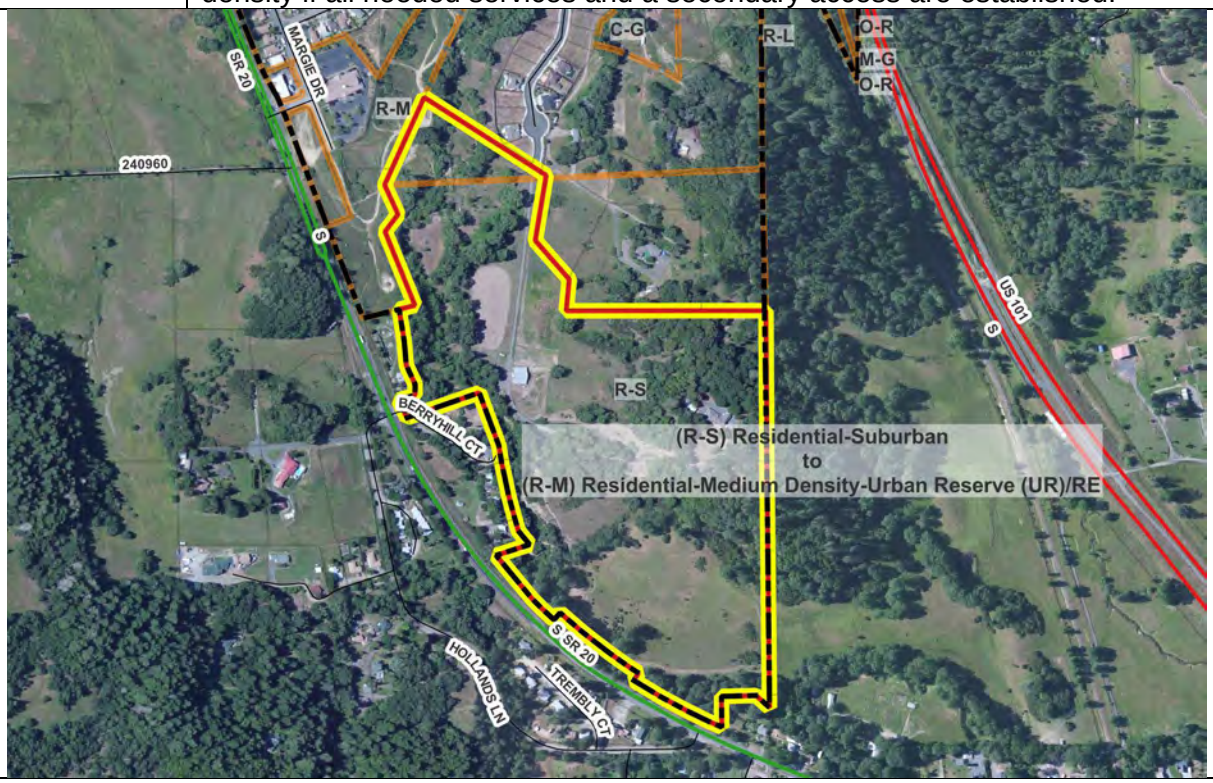
South Main Street Vacant Commercial [Commercial-General - to -Residential-Medium Density]

Description	This area is located on the west side of South Main Street between the back of O'Reilly's Auto Parts and Baechtel Creek. This area is currently planned "Commercial-General" and proposed to be planned "Residential-Medium Density."
APNs / Area	Portions of 2 APNs / 4.3 acres most of which is vacant & developable
Ownership	Single property owner
Proximity & Access	Located behind commercial uses fronting South Main Street. Primary access would be via what appears to be a 30-foot access from South Main Street. A new secondary access would likely be required to the south to allow full development
Topography & Constraints	Flat and gently sloped areas, Baechtel Creek stream and riparian area
Utilities	City water service, hydrants, and wastewater is provided and located within "Main pressure zone," which likely has adequate storage.
Land Use	Current: "Commercial-General" / Proposed: "Residential-Medium Density"
Development Potential	The property proposed to be planned "Residential-Medium Density" has substantial development potential and could accommodate approximately 90 units at maximum density.



South Haehl Creek Area [Residential-Suburban - to - Residential-Medium Density / "Urban Reserve"

Description	This area is located south of the Haehl Creek subdivision and is the southernmost property in the City of Willits. This area is currently planned "Residential-Estates" and proposed to be planned "Residential-Medium Density" with the "Urban Reserve" overlay, limiting development potential until infrastructure and services, including two access routes, are present
APNs / Area	2 APNs / 60.1 acres most of which is vacant & developable
Ownership	One property owner
Proximity & Access	Access from East Hill Road, which extends south from Haehl Creek Court and distant from the downtown core commercial area, schools, and services. A new secondary access road would likely be required to the south to allow full development
Topography & Constraints	Rolling hills with a small amount of slopes > 30%. Fault zone, limited slopes > 30%, limited streamside areas
Utilities	The city's 8-inch water main in the Haehl Creek subdivision area likely 1/4 mile away. Located within "Main pressure zone" likely has adequate storage. City 8-inch sewer main in Haehl Creek subdivision area likely 1/4 miles away.
Land Use	Current: " Residential-Suburban" / Proposed: "Residential-Medium Density" "Urban Reserve"
Development Potential	Approximately 30 appear to be developable, which has substantial development potential and could accommodate up to 1,000 units at maximum density if all needed services and a secondary access are established.



Proposed SOI Additions

Based on the characteristics described above, the existing SOI provides little or no housing development potential, without redeveloping some or all of the SOI. Given that almost all properties are under separate ownership and average about 6,500 square feet in size, it would be challenging to feasibly assemble parcels in a manner where the area can be developed with higher density housing. As a result, additional areas have been evaluated for inclusion in the SOI.

To define an SOI expansion area, the City evaluated land within the Planning Area guided by characteristics including: the land use designation applied as part of the Mendocino County General Plan and the use of land; proximity to the City and its neighborhoods and how an area may contribute to a logical City boundary; the presence of existing City water or wastewater services and the relative difficulty in expanding or establishing service; the presence of sensitive natural resources or natural hazards; and proximity to City and regional transportation networks.

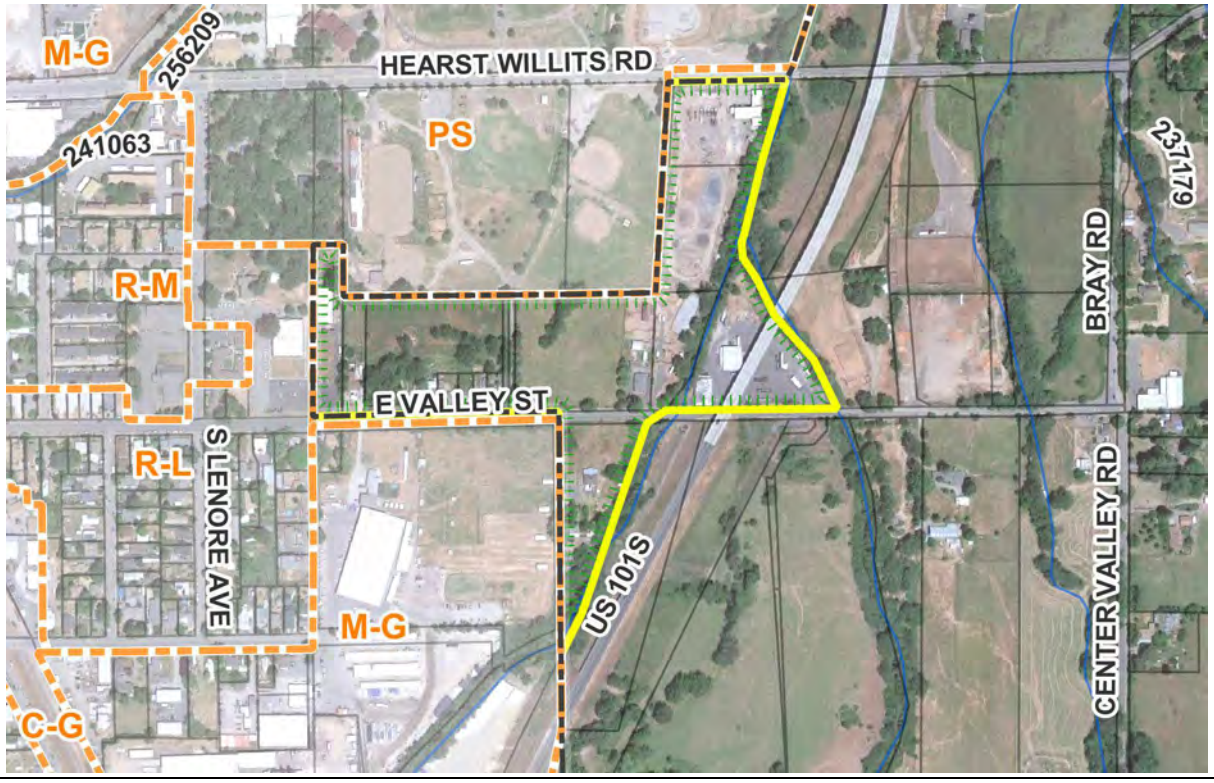
The following tables and maps identify the areas that the City of Willits proposes to submit to the Mendocino LAFCo as an amendment to the City SOI. For each proposed SOI addition area, the table contains a general description, the size of the area and number of Assessor's Parcels, the relative proximity to the City and how the area is accessed, the topography and natural resource or hazard constraints to development, existing utilities provided and the proposed Land Use Designations. The City proposes to apply City General Plan Land Use Designations to the SOI portion of the Planning Area.

Muir Mill Road

Description	Small parcel containing a church located on SR 20 south of Muir Mill Road (1 acre) (Planned by Mendocino County as "Suburban Residential")
APNs / Area	1 APNs / 0.86 acres
Ownership	Single property owner
Proximity & Access	Located approximately 1/4 mile from Evergreen Shopping Center which is considered walkable. Access to the parcel is from South Main Street (SR 20) and Muir Mill Road
Topography & Constraints	Flat with no obvious hazard or natural resource constraints
Utilities	City water service is provided via 8 inch main. Hydrants near parcel. Within the "Main pressure zone" likely has adequate storage. 6-inch sewer main within 700 feet
Land Use	Proposed: "Residential-Medium Density"
Development Potential	Zoned for multifamily development, water service present and sewer service nearby, Good street access, unclear if parcel will continue as a church. Approximately 10 multi-family units could be achieved if the parcel were redeveloped

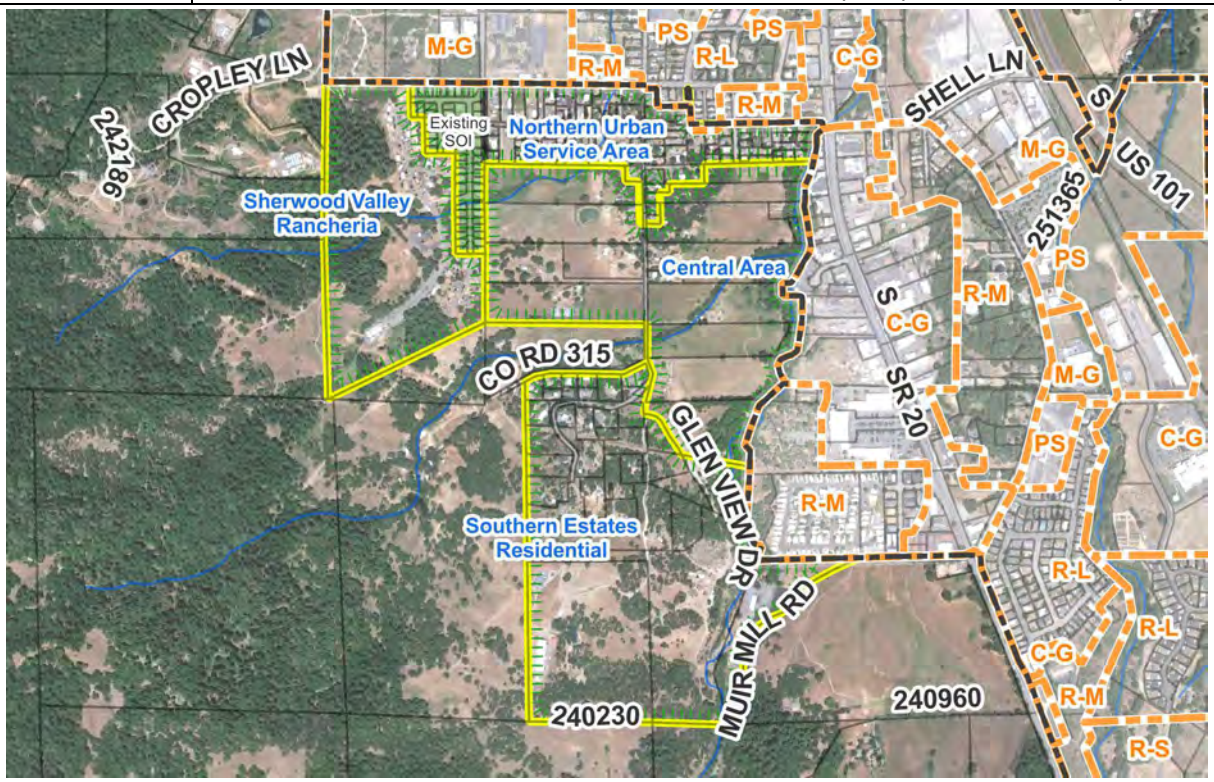
East Valley Street

Description	Two developed parcels one containing County of Mendocino law enforcement facility and the other a single-family residence (Planned Agricultural Lands) and five parcels development with single family residence, four of which are less than a quarter acre and one is approximately 3.5 acres (Planned Suburban Residential)
APNs / Area	15 APNs, 10 privately owned parcels are improved / 23.0 acres total, 6.5 developable
Ownership	Multiple property owner
Proximity & Access	Approx. 1/2 miles from N. Main Street commercial area. Marginally walkable Good access. Parcels front on East Valley Street.
Topography & Constraints	Flat land. Flood plain and dam inundation areas, potential wetlands
Utilities	City water service is provided through 8 inch main. Fire hydrants in front of parcels. Located within "Main pressure zone" likely has adequate storage. Sewer main in East Valley Street is 6 inch and less than 800 feet from most parcels
Land Use	Proposed: "Agricultural" / "Residential-Medium Density" / "Industrial-General" / "Public-Service"
Development Potential	Good access and good availability to utility service. Flood and dam inundation hazards will require additional engineering, and although there are many owners, there is one larger developable property. Up to 20 units of multi-family development is possible at maximum development potential



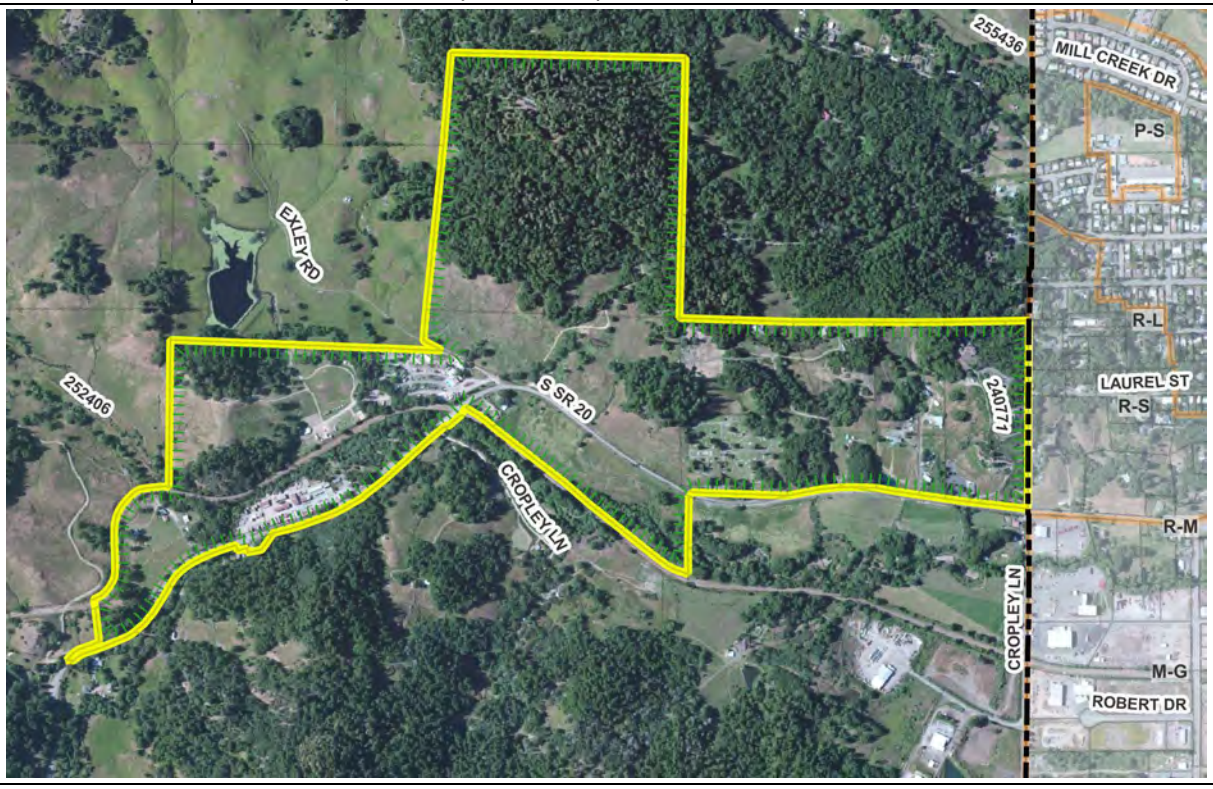
Locust Street Area

Description	A large area on the west side of the City that surrounds the existing SOI. This area is defined by the Sherwood Valley Rancheria and casino to the northwest, smaller parcels containing manufactured homes and single-family residences to the northeast, and large-lot rural residential parcels in the lower three-quarters. The northern 162 acres, including the Sherwood Valley Rancheria, is a Disadvantaged Community.
APNs / Area	145 APNs / 325.4 acres total, 20 vacant parcels ranging from 4,600 square feet to 8.5 acres and averaging 1.4 acres
Ownership	Multiple property owners
Proximity & Access	Approx. 1 mile to S. Main Street. Not walkable. Access from Blosser Lane and Locust Street. Limited sidewalks and dead-end roads
Topography & Constraints	Mostly flat with slopes to the south. Potential wetlands, riparian areas, flooding and ponding, prime farmland if irrigated is present
Utilities	City water service through 6-inch mains and sewer service through 8-inch main in northern urban service area. Water storage in the “Locust pressure zone" is limited. Limited hydrants.
Land Use	Proposed: “Residential-Low Density” /“Residential-Medium Density” / “Residential-Suburban” / “Industrial-General”
Development Potential	Good topography, flooding/wetlands/riparian constraints, significant utility improvements, road widening, and new secondary access needed. At maximum buildout, between 150 and 700 units could be developed, per desired density



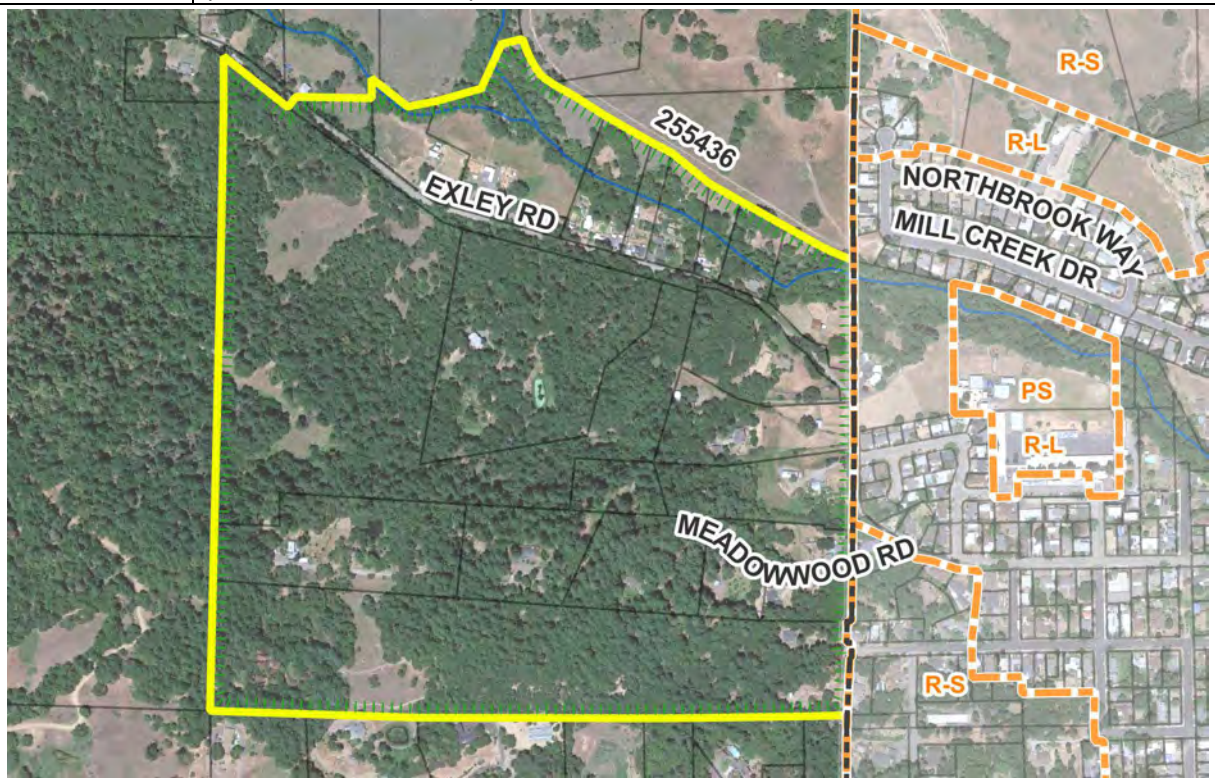
West SR 20

Description	An area extending approximately 1.25 miles west of Willits on either side of State Route 20 containing sloped rural residential land, bottom grazing land, an RV park, and vacant industrial area.
APNs / Area	30 APNs / 277.7 acres total, 14 vacant parcels ranging from ½ acre to 80 acres and averaging approximately 18.0 acres
Ownership	Multiple property owners
Proximity & Access	Greater than. 1 mile to S. Main Street. Not walkable. SR 20 provides direct access, but the speed limit is 55 MPH which will make it difficult to establish new encroachments with higher vehicle trip volumes
Topography & Constraints	Flat land on the South side of SR 20 and hill slopes including >30% slopes north of SR 20. Narrow flood plain within Broaddus Creek riparian area, steep slopes to the north, some prime farmland if irrigated and appears to be used for grazing
Utilities	City water service is provided through 8 inch main. Fire hydrants in front of parcels. Located within "Main pressure zone" likely has adequate storage. Sewer mains in SR 20 is 6 inch and approx. 1/2 miles from most parcels
Land Use	Proposed: "Residential-Low Density"/ "Residential-Suburban" / "Commercial-General" / "Industrial-General" / "Public - Service"
Development Potential	Lands on the hill slope have limited development potential unless combined into larger holding to allow new single access to be developed. Flat lands under single ownership and, if converted from ag land, could be developed using an improved Cropley Lane for access, significant utility improvements. Approx. 50 to 150 housing units could potentially be developed



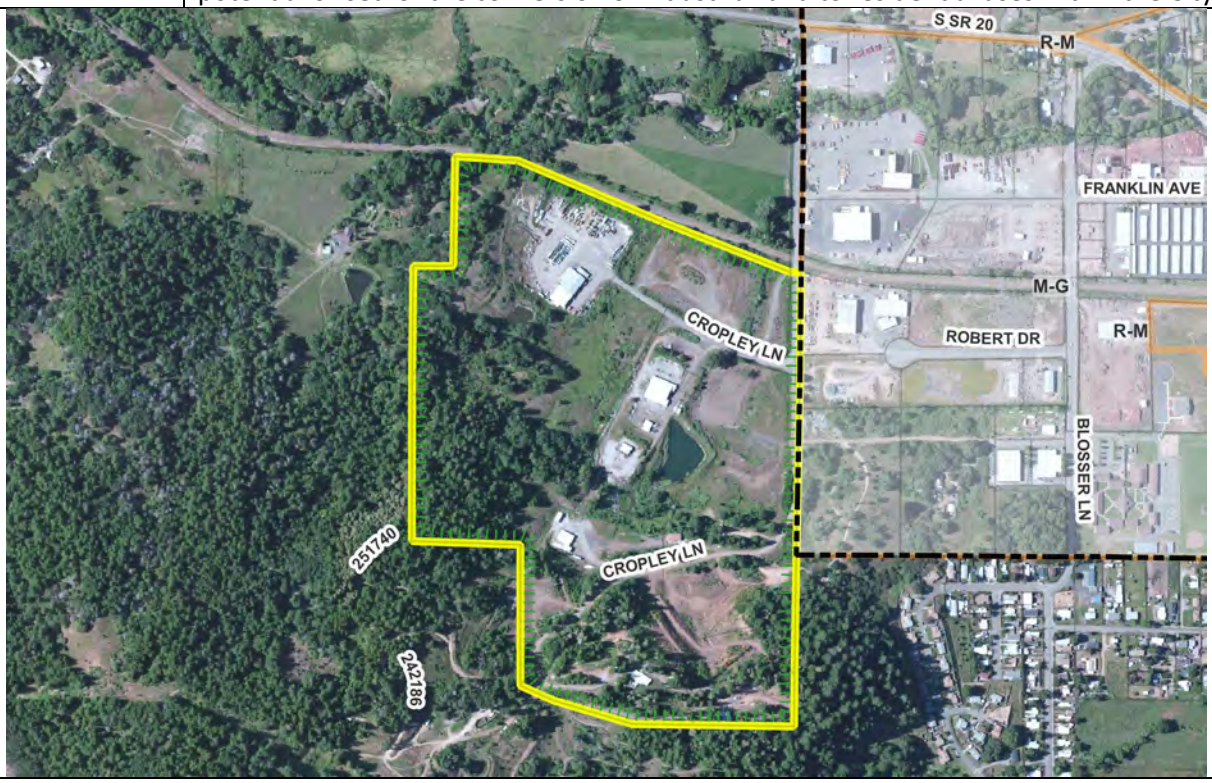
Mill Creek Area

Description	An area extending approximately 1.25 miles west of Willits on either side of State Route 20 containing sloped rural residential land, bottom grazing land, an RV park, and vacant industrial area.
APNs / Area	23 APNs / 148.2 acres total, 2 vacant parcels, one less than two acres and the other approximately 40 acres / Improved parcels range from less than two acres to 40 acres and average 20 acres
Ownership	Most parcels are smaller with individual ownership. Low likelihood of parcel assembly and large coordinated development. Development likely to be incremental
Proximity & Access	Approx. 3/4 miles from N. Main Street. May not be considered walkable. Exley Road and Meadowood Road provide limited access but are dead-end roads
Topography & Constraints	Hill slopes, some >30%, and flatter land along stream banks. Flood plain and dam inundation along Mill Creek and moderate to steep slopes away from the stream
Utilities	City water service through private laterals. Nearest water lines are ≤ 6 inch. Extending and looping a 6-inch water line may not provide adequate flow. Water storage in the "Redwood pressure zone" may also be limited. Nearest hydrant is at least 1/2 mile from most parcels. Most sewer mains in proximity to this area are 6 inches. The 14-inch sewer main to Brooktrails Township passes through this area to Mill Creek Drive.
Land Use	Proposed: "Residential-Suburban"
Development Potential	Mostly poor topography, poor access, significant utility improvements, and high number of property owners. There is little new development potential. There is potential for redevelopment and the addition of ADUs



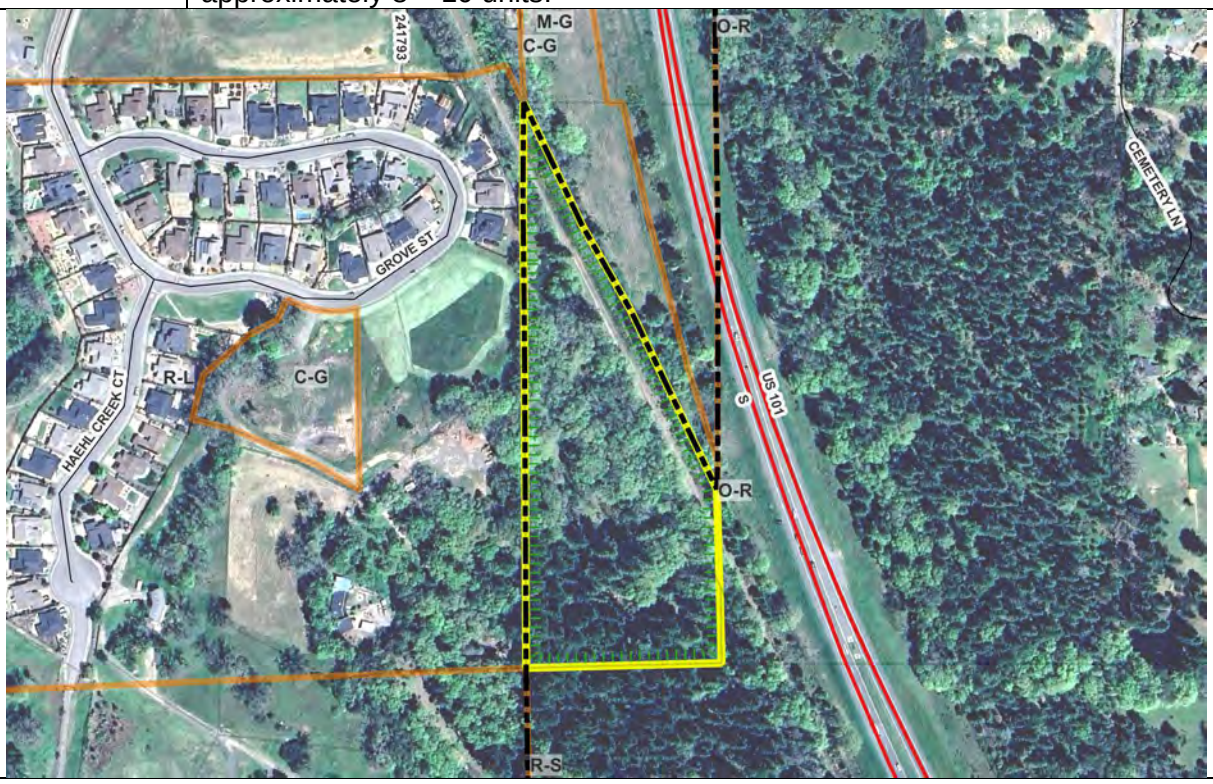
Cropley Lane Industrial

Description	An area extending approximately 1.25 miles west of Willits on either side of State Route 20 containing sloped rural residential land, bottom grazing land, an RV park, and vacant industrial area.
APNs / Area	7 APNs / 91 acres total, 4 privately owned parcels
Ownership	Multiple individual property owners, including the Sherwood Valley Rancheria. Limited likelihood of parcel assembly and large coordinated development. Development likely to be incremental
Proximity & Access	> 1 mile to S. Main Street. Not walkable. Access from Cropley Lane at SR 20. Narrow poorly surfaced road provides limited access but are dead-end roads. Would be best to connect to Blosser Lane.
Topography & Constraints	Flat land in the north hill slopes including mostly >30% to the south. Potential soil contamination from historic industrial use (if new use is proposed) and steep slopes
Utilities	City water service through private lateral to one parcel. Nearest water lines are 10 and 8 inches but no direct road ROW access. No fire hydrants near parcels. Located within "Main pressure zone" likely has adequate storage. Nearest sewer lines are 10 and 8 inch and located on Robert Drive and at the end of Franklin but no direct road ROW access.
Land Use	Proposed: "Industrial-General"
Development Potential	This is industrial land and may best be used for this purpose. Could be considered as a potential offset for the conversion of industrial land to residential uses within the City.



East of Grove Street

Description	A wooded area with rolling terrain east of the Heahl Creek subdivision area
APNs / Area	1 APN / 8.3 acres
Ownership	Single property owner
Proximity & Access	Access from East Hill Road, which extends south from Haehl Creek Court and distant from the downtown core commercial area, schools, and services. A new secondary access road would likely be required to the south to allow substantial development
Topography & Constraints	Rolling hills with a small amount of slopes > 30%. Fault zone, oak woodlands
Utilities	The city's 8-inch water main in the Haehl Creek subdivision area likely 1/4 mile away. Located within "Main pressure zone" likely has adequate storage. City 8-inch sewer main in Haehl Creek subdivision area likely 1/4 miles away.
Land Use	Proposed: "Residential-Suburban"
Development Potential	Mostly oak woodlands, poor topography, poor access, and significant utility improvements, high number of property owners. There may be potential for approximately 8 – 10 units.



Provide for Focused Planning for Willits' Commercial Centers

The General Plan includes two policy focus areas relating to commercial areas: one regarding the Downtown area and a second regarding the South Main Street area. The Downtown Area includes most of the area identified as the Downtown Specific Plan area and includes Main Street generally between State Street and South Street and South Main Street includes the area on either side of South Main Street/State Route 20 between South Street and Muir Mill Road. The following area summaries of policies and programs for each area.

Downtown Focus Area Policy and Programs:

- **Policies to encourage adaptive reuse of Main Street.** The creation of a new mixed-use Land Use Designation for Main Street between State Street and Oak Street that would provide flexibility in the Zoning standards to allow the adaptive reuse and revitalization of existing buildings and encourage creative Main Street redevelopment, including establishing flexible and appropriate lot standards, including reducing on-site parking requirements. (Policies LU-4.2 Main Street Mixed Use Land Use Designation, LU-4.3 Adaptive Reuse of Commercial Structures, LU-4.4 Off-Street Parking, and Programs Main Street Mixed-Use Zone, Downtown Action Program)
- **Policies relating to Main Street design and to improve the appearance and walkability of Main Street and Downtown.** Policies for Main Street and the Downtown Focus area would also protect and enhance Main Street shopfront buildings consistent with draft design guidelines prepared for this area, improve the environment or shopping and walkability, and that would also encourage further modifications that would slow traffic and improve comfort for people walking and riding bicycles. (LU-4.5 Downtown Gathering and Street Activities, LU-4.6 Slowing Traffic, LU-4.7 Main Street Shop Fronts)

South Main Street Focus Area Policy and Programs:

- **South Main Street Focused Planning**. Policies that encourage the City to conduct focused planning for the South Main Street area, in partnership with businesses, property owners, Caltrans and other appropriate organizations, to identify programs to facilitate ongoing commercial vitality and as a means of implementing desired improvements and Land Use policy specific to this area (LU-5.1 Focused South Main Street Planning)
- **South Main Street streetscape improvements.** Policies relating to street design standards, including lane configuration, coordinated landscaping, signage, street lighting, benches, wider sidewalks, safe crossings, and bike lanes to enhance and beautify the streetscape and building frontage standards to support businesses and to provide a safer, and more enjoyable atmosphere for shopping, walking, biking, outdoor seating and gathering, consistent with City Complete Streets policies (LU-5.2 South Main Street Improvements)

Provide for Land Use Flexibility and Compatibility

Development in the City of Willits has occurred over time and in many instances was constructed before the adoption of City Zoning Regulations resulting in structures and uses that may not conform to Zoning requirements but are part of the neighborhood fabric. The City seeks to provide flexibility in the Zoning Regulations to allow long-standing uses to continue, allow for the establishment of needed neighborhood commercial uses within residential areas and incorporate standards to protect vulnerable uses from excessive noise and other nuisances, while protecting businesses from the encroachment of sensitive use types that could limit their potential growth.

Land Use compatibility.

- **Compatibility.** Policies that direct the City to apply appropriate land use designations to land, such as applying residential designations to land containing exclusively residential development, to protect housing and other long standing uses and policies that direct building siting, design and buffers to limit nuisance impacts (LU-6.1 Limit Incompatible and Conflicting Uses, LU-6.2 Compatible Development, LU-6.3 Protect Long-Standing Compatible Uses in Older Neighborhoods)

Zoning Flexibility

- **Use Flexibility.** Policies that expand the allowance for interim agricultural use of vacant land from only industrial land to other large vacant properties until such time as the lands are utilized for their intended purposes and policies that encourage modifications to the Zoning Regulations to broaden the range of permitted uses such as creating limited neighborhood commercial combining zone that may be applied to residential zones and includes a specific range of allowable uses, clear performance standards, and a variety of permitting pathways to allow needed commercial uses in close proximity within residential areas and expanding the range of compatible home occupation uses (LU-6.6 Zoning Flexibility, LU-6.7 Support Home-Based Businesses))
- **Allowing a broader range of housing types.** Policy LU-6.5, Missing Middle Housing, acknowledges that most, if not all, of Willits is located within an Urban Cluster as defined by the U.S. Census and subject to California Senate Bill 9, which was approved in 2021 and requires ministerial approval of a housing development with no more than two primary units, or the subdivision of a parcel into two parcels, or both or that facilitates the creation of up to four housing units in the lot area typically used for one single-family home in a single-family zone.

Ensure Community Vitality Health and Sustainability

The City's current General Plan, to some degree, has prioritized public health and energy conservation by encouraging infill development within the City and by encouraging reductions in single-occupancy vehicle trips. The Land Use Element update seeks to enhance the connection between public health, land use planning, and community development by expanding access to public gathering areas, encouraging local production of and access to healthy foods. The City has prioritized the delivery of parks and recreation facilities and services, by establishing the target of 5.0 acres of parkland per 1,000 residents. Willits parks serve city residents and also and the surrounding areas, and to respond to this the City seeks to enhance its role as a regional park services provider.

Public Health

- **Policies to promote public health.** Policies that encourage the availability of healthy foods through means such as local organic food production and community gardens and policies that direct the City to consider public health, welfare, and safety when reviewing proposals for changes in land use and development (LU-3.5 Promote a Healthy Community, LU-3.6 Consider Public Health in Land Use, LU-3.7 Farmers Market).

Climate Change

- **Policies to reduce, adapt to, and increase resiliency to potential impacts of climate change.** Policies that encourage the installation of renewable energy systems and community-wide reductions in energy consumption, that direct the planning the public health implications of climate change and increase resiliency to potential impact, and that require the evaluation of new larger-scale residential, commercial, and industrial projects for compliance with state regulations and

require feasible mitigation measures to minimize greenhouse gas (GHG) emissions (LU-3.8 Energy Conservation and Reduction, LU-3.9 Plan for Climate Change, LU-3.10 Greenhouse Gas Emission Reductions)

Community Vitality

- **Policies to promote neighborhood vitality, health, energy efficiency, and conservation.** A encourage street designs and improvements that create a comprehensive, integrated transportation network that is safe, accessible, comfortable, accommodating, and welcoming to users and that implements the City's gateway enhancement program. In addition, policies that encourage the development of vibrant and walkable areas that reduce greenhouse gas emissions and promotes economic development by applying mixed use land use designations and by considering the feasibility of establishing a recreation and parks district that extends beyond City boundaries to finance facilities that support the region that may be provided by the City (LU-3.1 Complete Streets, LU-3.2 City Gateways and Corridors, LU-3.3 Mixed Use Areas, LU-3.11 Parks and Recreation)

Environmental Health and Safety

The Land Use Element includes policies and programs to add General Plan overlays and Combining Zones to enhance protective policies in the Conservation and Open Space Element and to ensure no net loss of wetlands as well as to protect riparian areas and to add zoning protections for oak trees and oak woodlands. These policies also include assurances that residential subdivisions with only one access in areas vulnerable to isolation cannot occur and to require notification to the appropriate military departments for discretionary development projects that may have the potential to affect military special use airspace areas.

Wetland and riparian area protections

- **Policies to require protection of wetlands and riparian areas.** A requirement that Conservation and Open Space Mitigation 4.135 be implemented as part of the review all discretionary and ministerial applications and that a Riparian Area Land Use Overlay be established to prohibit new development within buffer areas on either side of the stream, to be implemented by the establishment of a new combining zone (LU-9.1 Riparian Buffer Areas, LU-9.2 Not Net Loss of Wetlands Resulting from Development, LU-9.3 Riparian Area Land Use Overlay)

Urban forest management

- **Policies to protect oak trees and woodlands.** The City has adopted an Urban Forest Management Plan, and the Land Use Element incorporates policies and programs to implement the recommendations of that plan through modifications to the Zoning Regulations (LU-9.4 Protect Oak Trees and Woodlands)

Hazard management

- **Policies to enhance public safety and military readiness.** The City of Willits and the Planning Area underly a Military Operating Area and state general plan law requires local governments to consider the impact of development on military readiness activities and a new policy will require that notification be provided to the appropriate military departments for discretionary development projects that may have the potential to affect military special use airspace areas. In addition, there are areas within the City and SOI that are planned for residential development have only one access and new land use policy would prohibit subdivision unless alternative evacuation routes are established or where the Fire Marshal

has determined that access and egress are adequate (LU-9.5 Emergency Evacuation, LU-9.6 Military Operating Areas).

Expand and Improve Land Use Designations and General Plan Maintenance

The City has not updated its General Plan in about 30 years and proposes policies and programs to provide an at least a 20-year planning vision as well as provide the needed flexibility to allow for policy modifications to respond to unique situations while maintaining a consistent and predictable framework to achieve the City's long-term vision. The Land Use Element update also modifies and updates existing Land Use Designations consistent with the overall objectives of the Update and establishes new mixed-use land use designations.

General Plan Maintenance Implementation

- **Periodic General Plan Review and Zoning Implementation.** Policies direct the City to maintain and implement the General Plan through a periodic review timed with updates to the Housing Element and to update the Zoning Map and Regulations for consistency, In addition, the City is encouraged to consider streamline project review by expanding the process for approving minor exceptions to development standards and by using specific plans to implement the City's vision for specific areas by providing greater flexibility in development or to enforce stricter regulations (LU-3.4 Specific Planning, LU-10.1 Land Use Map, LU-10.2 Zoning Map and Regulations, LU-10.3 Periodic General Plan Review,LU-10.6 Streamlining Development Approval)
- **Availability of planning information.** Policies encourage the city to consider developing a web-based land use mapping system to enable the public to access land use information and resources. Policy also encourages the City to appoint a (LU-10.4 Web-Based Land Use Mapping, LU-10.5 Planning Commission)

General Plan Land Use Designations

The following table describes the City of Willits General Plan Land Use Designations. For land use designations that allow residential land uses a maximum allowable density is defined and, in some cases, a minimum allowable density is also applied. For mixed-use and commercial land use designations minimum and maximum residential densities are defined as well as a building intensity, expresses as a maximum ratio of building area to parcel area, or Floor Area Ratio. In addition, the abbreviation and color that is applied to the General Plan Land Use Map for that Land Use Designation is shown next to the name of the Land Use Designation.

In addition to the "base" Land Use Designations described above, the General Plan applies several additional overlay Land Use Designations. Some overlay designations are intended to inform landowners of the presence of a natural resource or hazard on or near their property and other overlay designations are associated with policies that regulate where development can occur on a parcel.

Table 2-10, Proposed Land Use Designations

Designation		Description	Dwelling Units Per Acre	Floor Area Ratio
(R-S) Residential-Suburban		Intended to provide a transition from rural to urban areas where soils, topography, and site conditions are more appropriate for large lot residential uses.	Min N/A 0.5 Max	N/A
(R-L) Residential-low Density		Applied to areas where City services are available or planned and single family residential is the dominant use.	Min N/A 15 Max	N/A

Table 2-10, Proposed Land Use Designations			
Designation	**Description**	**Dwelling Units Per Acre**	**Floor Area Ratio**
(R-M) Residential-Medium Density	Used where all urban services are available and close to services, recreation, schools, and employment and is suitable for mixed density residential uses allowing a variety of housing types.	15 Min 30 Max	N/A
(DM-U) Main Street Mixed Use	Intended to be applied to Willits' core downtown area to stimulate the adaptive reuse of existing buildings and the development of new pedestrian-oriented, mixed-use buildings.	15 Min 30 Max	3.0
(GM-U) General Mixed Use	Applied to specific areas within neighborhood and commercial centers where the existing or planned transportation alternatives, utilities, and services allow for mixed-use development that encourages walking, biking, and transit use. Allowable uses include retail, administrative office, general commercial, and a variety of housing types.	15 Min 30 Max	2.0
(C-G) Commercial-General	Applied to areas that may serve as central business districts or address the needs of the travelers and visitors as a result of the location, access, site characteristics, or proximity to neighborhoods or travel routes.	15 Min 30 Max	2.0
(M-G) Industrial-General	Applied to sites that are best suited for a variety of industrial operations because of access, location, availability of power, water, sewer services and transportation facilities, and where their operations will be compatible with adjacent uses. Allowable uses may include office; research and development; heavy commercial; shipping, storage, and warehousing; a range of compatible industrial and manufacturing uses; and general agriculture.	Min N/A Max N/A	1.0
(A-G) Agricultural - General	Applied to areas which are suitable for agricultural production because of historical use or future potential based on soil capability. Allowable uses include general agriculture, agriculture-related visitor serving activities, and rural residential uses that support agricultural operations.	Min N/A Max 0.05	N/A
(P-S) Public - Service	Applied to public sites of schools, parks, civic centers, fairgrounds, airports, museums, libraries, auditoriums, utilities and infrastructure, corporation yards, hospitals, social service centers, and similar uses, and may be applied to investor-owned utility and quasi-public sites.	Min N/A Max N/A	N/A
(O-S) Open Space - Recreation	Applied to unimproved land in its natural state which is to be conserved for open space and/or recreation purposes. Allowable uses include natural resource protection and restoration, outdoor recreation, and general agriculture.	Min N/A Max N/A	N/A
Overlay Land Use Designations applied in combination with a base Land Use Designation			
(-G) Natural Hazard Area	This overlay designation is intended for information purposes and is applied to lands subject to hazards that may include to excessive slopes, erosion, soil stability, seismic hazards, wildfire periodic inundation and other similar natural hazards to life, property, and the natural environment. for the protection of persons and property		

Table 2-10, Proposed Land Use Designations			
Designation	Description	Dwelling Units Per Acre	Floor Area Ratio
(-FW) Conservation - Floodway	This General Plan overlay designation is intended for information purposes and is applied to waterways and primary drainage channels to indicate the need to protect channels for the free flow of storm waters and to indicate the presence of adjacent floodplains for the protection of persons and property.		
(-H) Historical Resources	This General Plan overlay designation is applied, for information purposes, to historical resources within the community. The intent of the Historical Resources classification is to encourage the preservation and enhancement of unique historical resources in the City of Willits		
(-R) Riparian Areas	The purpose of this designation is intended to identify important stream and riparian areas where reasonable buffers should be applied to indicate the need to protect, as part of development review, sensitive fish and wildlife habitats and to minimize the potential for erosion, runoff, and interference with surface water flows and that balance to the greatest extent feasible resource protection and property rights		
(-UR) Urban Reserve	The purpose of this designation is to protect from premature subdivision and development, urban lands or land within the Sphere of Influence not now developed to urban densities or adequately provided with urban services but expected to develop to urban uses and densities when services are available. This designation is used where annexation is required for urban services and full build-out.		

ZONING MAP AND REGULATIONS

Zoning Map

As part of the Land Use Element update, the City of Willits is proposing to update the Zoning Map to be consistent with the Land Use Map, see Figure 2-6 Proposed Zoning Map. In some cases, the current Zoning is not consistent with the current General Plan Land Use Designation that is not proposed to change, and the Zoning Classification must be revised to be consistent with the Land Use Designation. In other cases, the Land Use Element update includes to amend the General Plan Land Use Designation and the Zoning Classification must be revised to be consistent. Land Use Element Table 1-1 includes a matrix that identifies the Zoning Classifications that are consistent with each Land Use Designation. Following the adoption of the General Plan Land Use Element, the City intends to adopt by ordinance an amended Zoning Map applying Zoning Classifications, consistent with Table 1-1.

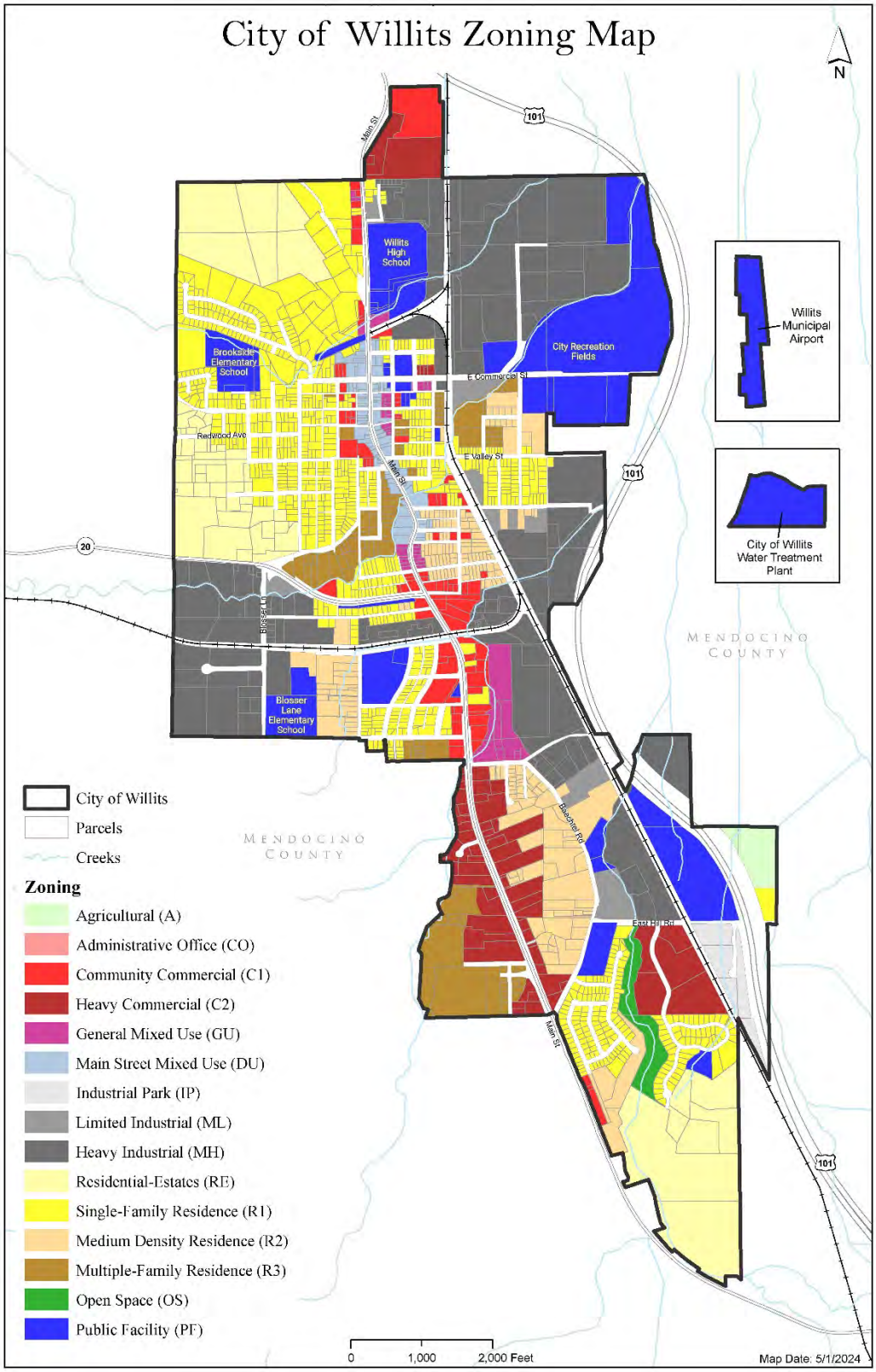
Zoning Regulations

The City of Willits is also proposing to amend the Zoning Regulations by ordinance following the approval of the Land Use Element to be consistent with the changes in the General Plan. Detailed ordinance language specifying the precise details of the amendments to the Zoning Regulations has not yet been prepared. The following is a general description of the proposed amendments to the Zoning Regulations to implement the Land Use Element.

New or Modified Principal Zoning Districts

The following new Zoning Districts or modifications to existing Zoning Districts are proposed to be added to the Zoning Regulations to implement the Land Use Element.

Figure 2-6 Proposed Zoning Map



Add Main Street Mixed-Use Zone

Add a Main Street Mixed-Use Zone to the area designed with a Main Street Mixed-Use Land Use Designation that provides for a consistent range of principally and conditionally permitted uses, including commercial, office, service, and residential; establish design standards reflecting the Willits Downtown Design Guidelines, which generally include requirements for commercial uses along building frontages that allow residential and commercial uses behind and above within the area north of California Street and allow residential uses on the ground floors between California and Oak Streets, where ministerial projects that can be implemented using a checklist format; and establish procedures for no, or reduced, off-street parking requirement where a "park once" parking monitoring and management program has been implemented.

Add General Mixed-Use Zone

Add a General Mixed-Use Zone that principally permits a range of use types and provides ranged of conditionally permitted uses consistent with the General Mixed-Use Land Use Designation including retail, administrative office, general commercial, and a variety of housing types. Development and design standards are intended to be simple, where compliance can be demonstrated through a check list. Building and lot standards encourage a walkable environment and the efficient use of land and are intended to reflect the surrounding neighborhood (compatible building height and setbacks) and encourage pedestrian-friendly buildings with shop fronts on ground floors. Off-street parking requirements shall allow for shared-use spaces, include standards to allow principally permitted reduced parking requirements in exchange for meeting specific standards.

New or Modified Combining Zoning District

The following new Combining Zoning Districts or modifications to existing Combining Zoning Districts are proposed to be added to the Zoning Regulations to implement the Land Use Element.

Add Stream and Riparian Area Combining Zone

Add a Stream and Riparian Area Combining Zone to parcels that contain or are adjacent to natural creeks, streams, and riparian t that specifies protective criteria consistent with consistent with to the Land Use Element Riparian Area Land Use Overlay. The Combining Zone shall prohibit development within 30 feet from the top of bank on either side of the stream, and shall contain regulations the implement the following requirements and exceptions: buffers may be reduced or eliminated where the City determines, in consultation with CDFW, that the reduction will not significantly affect the biological resources of the creek or stream within the property; when the prescribed buffer prohibits development of the site for the primary use for which it is designated, measures shall be applied that allow development that results in the least environmentally damaging feasible project; road, bridge, and trail construction or replacement may be permitted that would not degrade fish and wildlife resources or water quality, and where vegetative clearing is kept to a minimum; the removal of vegetation for disease control or public safety purposes may be approved, in consultation with CDFW.

Add Limited Neighborhood Commercial Combining Zone

Add a Limited Neighborhood Commercial Combining Zone to provide greater flexibility in the range of permitted and conditionally permitted uses in commercial and residential areas to allow residences on upper floors and behind shop fronts or consider establishing limited neighborhood commercial combining zone that may be applied to residential zones and includes a specific range of allowable uses, clear performance standards, and a variety of permitting pathways to allow needed commercial uses in close proximity within residential areas

Other Zoning Regulations Amendments

Renewable Energy Systems

Modify the Zoning Regulations to facilitate the installation of renewable energy systems, such as solar arrays, and the development of battery storage and micro grid capacity for storing renewable power. A (LU-3.8 Energy Conservation and Reduction)

Site Development Standards

Landscape Buffers. Add performance standards for industrial and heavy commercial development adjacent to residential areas to provide buffers, landscaping, and screening that minimize noise, light, glare, and other impacts. The purpose of the landscape buffers is to provide screening or buffering between adjacent uses or zoning districts that are intended to reduce noise or light from adjacent and potentially incompatible uses to acceptable levels. Such buffers can be applied to specific uses as part of ministerial or discretionary review to limit adverse impacts from future development on surrounding properties. (LU-6.1 Limit Incompatible and Conflicting Uses)

Expand Range of Allowable Home-Based Businesses

Section 17.66.040 Home Occupation. Identify additional uses that are not enumerated in the existing Home Occupation Regulations as well as other modifications to those Regulations, which could be permitted and would not change the residential character of either the dwelling or the surrounding neighborhood. The purpose of this effort is to support local economic development by allowing for an increase in the scale and range of allowable home-based business types in residential zones where potential nuisances are addressed through the permit approval process.

2.6 PROGRAM EIR PROJECT APPROVALS AND IMPLEMENTATION

INTENDED USE OF THIS EIR

This EIR provides a programmatic environmental review of the implementation of the City of the update to the Willits Land Use Element. Subsequent activities falling under the project will utilize this EIR to focus the individual environmental review of such consequent activities and to determine their effects. If a new project is proposed that is not anticipated by the Land Use Element, or that may result in project-level environmental effects not addressed in this program-level EIR, the future proposed project would be evaluated as required under CEQA.

PROJECT APPROVAL

The following list specifies the anticipated approvals necessary for the proposed Project. The City Planning Commission and City Council (the City Council in Willits sits as the Planning Commission and is the final approving authority) will review the General Plan Land Use and the PEIR and supporting documents to consider whether or not to take the following actions:

- Certification of a Final EIR,
- Adoption of the Land Use Element Update and Findings in consideration of the Final EIR,
- Adoption of a Mitigation, Monitoring, and Reporting Program from the Final EIR,

PROJECT IMPLEMENTATION

Following adoption of the Land Use Element by the City Council, all subsequent activities and any future development within the City would be guided by the goals and policies contained in the Land Use Element and the other Elements of the City of Willits General Plan. The City of Willits would also be required to coordinate with Mendocino County and other public agencies to implement policies that affect their respective jurisdictions or the overall region. Implementing these policies in accordance with new development would be subject to the City's review and approval processes, with final review and approval by the appropriate departmental staff as well as the appointed and elected officials. The principal responsibilities that City officials and staff have for project implementation are briefly summarized below:

- Adoption of amended Zoning Regulations and an amended Zoning Map to achieve consistency with the adopted Land Use Element, and
- Adoption of an application to the Mendocino LAFCo to amend the City of Willits Sphere of Influence.
- Rezoning other properties to further the objectives of the Land Use Element and as prescribed by future development approvals;
- Approving tentative maps, development agreements, variances, conditional use permits, and other land use permits and entitlements;
- Planning for public infrastructure such as roadway improvements, other capital improvements, and natural/capital resource preservation and/or restoration; and,
- Conducting or considering further focused planning studies, as appropriate to future development in the City

OTHER DISCRETIONARY APPROVALS

This document has been drafted at the program level and is intended to cover general matters and environmental effects for the overarching Land Use Element and Zoning Code amendments. Subsequent projects may require project level environmental review and may incorporate by reference the discussion included in this EIR. Additionally, subsequent development projects may also require review and approval by various departments or agencies outside of the City, including but not limited to those listed below. It should be noted that the following actions are associated with the future development of the City as it develops pursuant to the General Plan. That is, actions of the types listed here would occur whether or not the proposed Project was approved, and as such, these actions are listed as general items and are not directly associated with the proposed Project.

- Future development within or altering a 100-year floodplain or other FEMA-mapped flood hazard area would need to obtain a Letter of Map Revision (LOMR), Conditional Letter of Map Revision (CLOMR) or Conditional Letter of Map Revision Based on Fill (CLOMR-F) that describes the effect that the proposed project or fill would have on the National Flood Insurance Program map.

- National Pollutant Discharge Elimination System (NPDES) Construction General Permits will be required for grading activities of 1 acre or larger. The developer must file a Notice of Intent with the Regional Water Quality Control Board (RWQCB) and obtain a General Construction Activity Stormwater Permit pursuant to the NPDES regulations established under the CWA. This permit requires preparation and implementation of a Stormwater Pullulation Prevention Plan, which is intended to prevent degradation of surface and groundwaters during the grading and construction process.

- Future development affecting Waters of the U.S. or adjacent wetlands would need to fill out a permit from the U.S. Army Corps of Engineers issued pursuant to Section 404 of the Federal Clean Water Act (CWA).
- Prior to obtaining a CWA Section 404 permit, a future development may also need to obtain a water quality certification or waiver from the Regional Water Quality Control Board pursuant to Section 401 of the Federal CWA.
- Future development affecting native habitat within a streambed may need a Streambed/Bank Alteration Agreement issued by the California Department of Fish and Wildlife pursuant to Section 1600 et seq. of the California Fish and Game Code.

3.0 ENVIRONMENTAL ANALYSIS

3.1 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

This section discusses the possible environmental effects of the City of Willits Land Use Element Update for all resources areas included in Appendix G of the CEQA Guidelines.

ESTABLISHING A BASELINE

What is a baseline?

STATEMENTS OF SIGNIFICANCE

A "significant effect" as defined by the CEQA Guidelines §15382 is:

". . . substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

The various levels of significance used in this document are as follows:

- Significant and Unavoidable. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the CEQA Guidelines.
- Less than Significant with Mitigation Incorporated. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.
- Less than Significant. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- No Impact. The project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

3.1 AESTHETICS

This section analyzes the impacts to aesthetics, including impacts to scenic vistas, scenic resources visible from a state scenic highway, visual character and quality, and impacts arising from the possible introduction of new sources of light and glare within the Project Area due to the Project. This section incorporates information and analysis from the 2022 Willits Rail with Trail Project IS/MND, 2021 City of Willits Urban Forest Management Plan, 2017 Downtown Willits Streets & Alleys Connectivity Study, 2016 Willits Main Street Corridor Enhancement Plan, 2003 Baechtel Road – Railroad Avenue corridor Community Design Study, 2002 Willits Bypass EIR, and the 2000 Downtown Specific Plan.

ENVIRONMENTAL SETTING

A. DEFINITIONS

Scenic Vista –A scenic vista generally provides focal views of objects, settings, or features of visual interest, or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. Scenic vistas are generally associated with public vantage points.

Visual Quality – Visual Quality pertains to the overall visual impression and aesthetic appeal of an area, influenced by the presence of scenic resources, both natural and constructed. It encompasses attributes such as diversity, vibrancy, coherence, uniqueness, harmony, and pattern. The impact on visual quality can vary among observers, depending on their exposure and individual preferences. Different land uses, whether open spaces or commercial districts, draw value from the quality of their surroundings. In this context, city gateways and expansive agricultural or open space vistas are recognized as integral to these land uses.

Light – Light is the emission of brightness created by a light source, be it stationary like a lamp post, or moving as would be the case with headlights from a car.

Ambient Light – Ambient light refers to the natural or existing level of light in the environment at a specific location and time, without any artificial sources of light.

Glare – Glare is compenetrated and intense light being emitted from a source or indirectly emitting light that is reflected off a surface. Reflective surfaces could be the glass exteriors to a building, windshields of parked cars, or even light-colored pavement.

B. EXISTING CONDITIONS

The City of Willits is located near the center of Mendocino County and lies approximately 24 miles north of Ukiah and 35 miles east of Fort Bragg on the coast of the Pacific Ocean. Situated on the western edge of the Little Lake Valley, Willits is surrounded by the California Coast Ranges. Several major transportation routes converge in Willits, including U.S. 101, State Route 20, the Great Redwood Trail Agency right of way (formerly the North Coast Railroad Authority), and the Mendocino Railway, known as the Skunk Train. Willits is considered the “Gateway to the Redwoods”, serving as the southern entrance to the north coast redwood forests.

The City of Willits General Plan recognizes several features that enhance the city's overall visual appeal. These include wooded ridgelines, riparian corridors, mature trees, and the historic train corridor, all of which contribute to the city's aesthetics. The General Plan also identifies the value of the surrounding agricultural lands and its mixed-use Main Street as land uses with important visual characteristics to the small-town aesthetics of the community.

Wooded Ridgelines

Willits is encircled by the ridgelines that form the Little Lake Valley. These wooded ridgelines provide a visual backdrop that includes a mix of coniferous and deciduous trees predominantly secondary forest consisting of tan oak, madrone, Douglas fir, and redwood trees. The wooded ridgeline viewshed juxtaposed with the coastal prairie grasslands of the Valley creates a vibrant display of colors, particularly in the fall.

The Little Lake Valley has an elevation of 1,404 feet and the ridgeline immediately around the area rise roughly another 1,000 feet. The higher peaks surrounding the Little Lake Valley include Foster Mountain with an elevation of 3,400 feet to the northeast and Snow Mountain to the east. Mendocino National Forest encompasses the mountain ranges to the east of Willits.

Figure 3.1a: Aerial View of Wooded Ridgelines Looking West of Willits

Source: (City of Willits, n.d.)

Riparian Corridors

Riparian corridors are characterized by vegetation along the banks of creeks or rivers. There are several small waterways within the Project Area of which include Baechtel Creek, Broaddus Creek, Outlet Creek, and Davis Creek. These areas provide areas for wildlife, with tall trees providing shade, erosion control, and a natural atmosphere.

Figure 3.1b: View of Baechtel Creek from Highway 20/South Main Street Looking West

Source: (Google, 2023)

Rural – Open Grazing or Grassland

Willits is within the Little Lake Valley which has a natural community of coastal prairie grasslands. These prairie areas support agricultural lands, undeveloped properties, and rural-scale development beyond City limits. These rural landscapes offer wide-open spaces and panoramic views of the surrounding hills and valleys. A variety of aesthetically appealing agricultural activities such as cattle grazing and hay production take place in these areas.

Figure 3.1c: View of Agricultural Lands East of Willits from the Willits Bypass

Source: (Google, 2023)

Mature Trees

There are various stands of mature tree groves, both coniferous and deciduous, located within Willits and the surrounding area. A recent inventory of the City's trees showed that 32% of trees in the City are mature and more than 25% of the City's tree inventory is planted in Recreation Grove Park (Dudek, 2021). Immature trees made up 20% of the inventory which is not the same rate for replacement of mature trees as they reach the end of their life cycles.

Figure 3.1d: Recreation Grove Park

Source: (City of Willits, n.d.)

Main Street

Main Street in Willits is the City's primary north-south artery and a historical focal point. Portions of Main Street serve as a welcoming thoroughfare, and it is predominantly lined with unique shops, local eateries, and traditional shopfront commercial buildings. Serving as the heart of Willits Downtown, Main Street has a blend of historic and modern architecture with a small-town ambiance. Within one block of Main Street are several properties on the National Register of Historic Places (California Office of Historic Preservation, 2023).

The Downtown portion of Main Street is a traditional mixed-use area that contains two distinct design character sections. In the Commercial area between Commercial Street and California Street there are predominantly single and multi-story shop-front buildings, the most notable is the iconic Van Hotel (the brick building behind the Commercial Street sign shown in Figure 3.1e below). The area between California and Oak Streets contains single-family homes and businesses in former residential structures. The Willits Downtown area and Main Street corridor reflect the traditional town design concept with close proximity between employment, services, and residences.

Figure 3.1e: View of Highway 20/South Main Street looking South from Commercial Street

Source: (Google, 2023)

Figure 3.1f: View of Highway 20/South Main Street looking North from Oak Street

Source: (Google, 2023)

The South Main Street area between South Street and Muir Mill Road serves as the City's southern gateway. The buildings in the South Main Street area are set well back from South Main Street/State Route 20. The Willits Main Street Corridor Enhancement Plan identified that beautification, identity, access, and safety as priorities for South Main Street.

Figure 3.1g: Willits Arch on Highway 20/South Main Street Looking North

Source: (City of Willits, n.d.)

Train Corridor

The Skunk Train is a historic railway line that runs through the outskirts of Willits and traverses the Little Lake Valley floor into the mountains and goes all the way to the coastal town of Fort Bragg. This rail corridor features a scenic route that travels through dense forests and across wooden trestles. Within City limits, views in the railroad corridor are rustic industrial in nature. Outside of the City, the route provides passengers with views of the surrounding woodlands.

Figure 3.1h: View of Skunk Train Rail Corridor in Willits Looking South

Source: (City of Willits, 2022)

The Willits Depot, which serves as the Train Depot for the California Western Railroad that runs the Skunk Train excursion line to Fort Bragg, is an important historical landmark that is also on the National Register of Historic Places. The Willits Depot is two blocks from Main Street which is another priority visual characteristic for the City. The City has undergone extensive community outreach and planning to potentially increase aesthetic appeal and pedestrian access between these two Downtown areas.

Figure 3.1i: View of the Willits Depot

Source: (Google, 2023)

C. Scenic Corridors

Within the City, there are no scenic corridors currently listed under the State Scenic Highway Program. However, two locations have been identified as eligible for listing: the corridor of HWY 101 to the HWY 20 segment of South Main Street from South Street to Muir Mill Road and the remainder of HWY 20 heading towards Fort Bragg (Caltrans, 2023). HWY 101 runs through the City from the north to the south, and everything south of Willits to Calpella eligible for the Scenic Highway Program. Prior to the Willits bypass, the South Main Street segment of HWY 20 was part of HWY 101 instead. HWY 20 runs through the City of Willits going west and the whole region from Willits to Fort Bragg on HWY 1 is eligible for listing.

D. Light and Glare

Current existing sources of night lighting include residential, commercial, industrial, or public uses (such as parks, schools, and administrative facilities). Ambient lighting levels are influenced by existing development including interior and exterior lighting, as well as street lighting, and headlights from vehicles.

Regulatory Setting

Federal

There are no federal regulations pertaining to aesthetics that are applicable to this analysis.

State

Scenic Highway Program

The California Legislature established the Scenic Highway Program in 1963 to safeguard and maintain the visual appeal of highway corridors by preventing changes that would diminish the aesthetic value of the surrounding lands. The laws governing this program can be found in the Streets and Highways Code, Section 260 and following. The State Scenic Highway System inlcudes a list of highways that are either eligible for designation or have already been designated as scenic highways, as outlined in Section 263.1 of the Streets and Highways Code.

The designation of a highway as scenic depends on several factors, including the extent of natural landscape visible to travelers, the scenic quality of the landscape, and the level of development that interferes with the traveler's enjoyment of the view. When a city or county proposes an eligible highway for official designation, it must define the scenic corridor of the highway. The scenic corridor encompasses the land generally located adjacent to the highway and visible from it. The selection of a reasonable boundary is based on the motorist's line of vision, typically extending to the distant horizon.

It's important to note that the corridor protection program does not prohibit development but rather encourages high-quality development that preserves the scenic value of the corridor. The nominating agency, which holds jurisdiction over the area, must also establish ordinances or document existing regulations that ensure the preservation of the scenic quality within the corridor. These ordinances constitute the scenic corridor protection program. Additionally, county roads can also be included in the State Scenic Highway System. To obtain official designation, the county must follow the same process required for the designation of State Scenic Highways.

According to the latest list of designated scenic highways under the California Scenic Highway Program the following regions are eligible for listing but have not been designated (Caltrans, 2023):

- Route 20 from Route 1 near Fort Bragg to Route 101 near Willits is included in the scenic highway system
- Route 101 from Route 20 near Calpella to Route 20 near Willits

REGIONAL AND LOCAL

Willits General Plan

The Willits General Plan Revision – Vision 2020 was adopted in 1992. Section 3.210 of the Conservation and Open Space Policies directs the City conserve, to the greatest feasible extent, the City's existing natural resources, with particular emphasis on air and water quality, open space, tree preservation and riparian habitat maintenance and enhancement. Conservation and Open Space Sections 4.831-4.834 directs the City to:

- Utilize the policies contained in the Conservation and Open Space Element to preserve and enhance the City's existing visual environment.
- Encourage projects which clearly enhance the visual characteristics of the site and the surrounding area.
- Utilize the application review process to seek modifications in proposed plans which negate the adverse visual impacts or enhance the visual attributes of proposed development projects.
- Preserve trees and other significant visual features through enforcement of existing ordinances and enactment of new ordinances where appropriate.

The Conservation and Open Space Element seeks to protect historic sites within the City through project review:

- Review of development projects in the vicinity of historic sites noted on the Historical and Archaeological Resources Map shall include consideration of visual and architectural impacts on existing structures of historical significance.
- Project review by the California Archaeological Inventory (CAI) shall be required as part of the application for development projects in potentially significant areas shown on the Historical and Archaeological Resources Map. If the project review indicates a likelihood of significant archaeological resources in the area proposed for development, field observation by qualified archaeological personnel shall be required. All necessary archaeological analysis shall be conducted at the expense of the applicant.

Willits Municipal Code

Willitts Municipal Code, 8.20.020, Nuisance, prohibits the establishment, continuation, or upkeep of any condition classified as a nuisance by City ordinances, code sections, council resolutions, or state statutes, deeming such actions unlawful and subject to misdemeanor charges. Conditions which constitute a nuisance include:

A. Accumulation of junk, rubbish, waste, refuse or other material of unsightly or unhealthy nature and which may endanger or injure neighboring property or the health and welfare of the residents of the vicinity
B. A fire hazard as defined in the Uniform Fire Code
C. Any substandard building pursuant to Health and Safety Code Section 17920.3
D. Polluted or stagnant water which because of its nature or location constitutes an unhealthy or unsafe condition;
E. Maintenance of property in such a condition as to become defective or in a condition of deterioration or disrepair that the same causes visual blight, or reduces the aesthetic appearance of the neighborhood or is offensive to the senses, or is detrimental to nearby properties including, but not limited to abandoned or partially destroyed buildings, structures in an extended state of partial construction, buildings with issues like dry rot or termite infestation, missing doors and windows, improperly stored appliances and construction equipment, hazardous trees and overgrown vegetation, deteriorated walls and structures, and other violations that are deemed public nuisances.

Section 17.50.010, Prohibition of Dangerous or Objectionable Elements, states that no land or building in any district shall be used or occupied in any manner so as to create any glare, among other things such as heat, cold, noise, and vibration.

Site Plan Review. Municipal Code Section 17.70 requires that site plans for development show walls, fences, landscaping, and the location and type (including hooding devices) of new lighting locations. These regulations require that in approving the site plan, the Director find that the proposed lighting is so arranged as to deflect the light away from adjoining properties and that proposed signs will not by size, location, or lighting interfere with traffic or limit visibility. Site plan approval may contain conditions relating to the regulation of lighting.

City of Willits Vacant Commercial Property Registration

Willits Municipal Code, Chapter 8.28, Vacant Commercial Property Registration and Property Maintenance, recognizes that abandoned and vacant buildings contribute to blight, discourage economic development, diminish appreciation of property values, endanger public health and safety, attract criminal activity, and create fire hazards. It is the responsibility of property owners to prevent buildings from

becoming a burden to the neighborhood and community and a threat to the public health, safety, and welfare. Vacant buildings result in increased expenditures for police, fire, and code enforcement inspections and calls. Maintenance of the public health, safety, and welfare thus requires the City to maintain an accurate registration of all Vacant Commercial Buildings and to impose certain requirements, procedures and penalties.

2021 City of Willits Urban Forest Management Plan

The Willits Urban Forest Management Plan (UFMP) establishes a framework for effective management practices and policies, aiming to cultivate a resilient and sustainable urban forest within the city. A sustainable urban forest not only enhances the community's well-being but also contributes to resilience in the face of climate change challenges. By mitigating extreme heat, managing stormwater, and improving air quality, urban forests play a vital role in fostering resilient communities. The City's comprehensive analysis of management practices, policies, ordinances, and funding, conducted as part of the UFMP, ensures a thorough understanding of strengths and weaknesses, guiding tree planting and maintenance efforts, particularly in disadvantaged areas.

2016 Willits Main Street Corridor Enhancement Plan

The Willits Main Street Corridor Enhancement Plan outlines a comprehensive framework for implementing both short and long-term changes along the Main Street corridor. The plan encompasses a range of improvements, including enhancements for motorized and non-motorized safety, pedestrian and bicycle amenities, as well as landscaping and hardscaping recommendations. Additionally, the plan strategically outlines implementation phases for the recommendations, identifies cost-based alternatives, and offers potential funding resources to support the proposed enhancements.

2000 Downtown Specific Plan

The Willits Downtown Specific Plan presents a comprehensive strategy for the growth, adaptive reuse, and revitalization of Downtown Willits. The plan tackles challenges on Main Street by addressing key aspects like parking strategies, placemaking initiatives, and innovative design concepts to uplift the area. Specifically, it promotes improved visibility through enhanced parking lot signage and explores the possibility of repurposing parking areas along Main Street. Emphasizing the necessity for public gathering spaces, the plan identifies potential sites for future development in the downtown Main Street area. In terms of design innovation, the plan introduces concepts such as bulbouts and intersection enhancements, gateway improvements, and enhancements to crosswalk infrastructure, all aimed at elevating the vibrancy and functionality of Main Street.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, impacts related to aesthetics from implementation of the project would be significant if it would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
3. In non-urbanized areas, substantially degrade existing visual character or quality of public views of the site and its surroundings, or, if the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality; or

4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Assessments of aesthetic impacts involve a qualitative analysis that is subjective but guided by the above principles. An adverse effect would occur if development facilitated by the Land Use Element would obscure or otherwise damage scenic resources. Reactions to aesthetic conditions can vary widely based on individual tastes and interests. It is important to note that the project in question pertains to updates to the General Plan Land Use Element and not a specific development proposal. Consequently, this analysis primarily focuses on a general examination of the potential for aesthetic impacts in Willits. Key considerations include the arrangement of built spaces in relation to open spaces, the density and intensity of development, and how new developments visually harmonize with the existing landscape that characterizes the area. The evaluation of impacts on visual character or quality resulting from the development facilitated by the Willits Land Use Element is made with reference to the visual conditions expected upon reaching full buildout.

PROJECT IMPACTS AND MITIGATION

Threshold AES-01: Would the project have a substantial adverse effect on a scenic vista?

Impact AES-01: With the addition of a new policy requiring that homes and roads on hillsides be clustered or sited and designed to preserve scenic character and that grading be minimized, the adoption of the Land Use Element Update into the General Plan, adverse effects of Project are less than significant.

A scenic vista is generally considered to be a view from a public place of objects, settings, or features of visual interest and panoramic views of large geographic areas of scenic quality. A scenic vista can be seen from an elevated position (such as from a public trail on the top of a hillside) or from a roadway with a longer-range view of the landscape. Examples of scenic vistas in the Planning Area include the visible hillslopes along State Route 20, riparian corridors adjacent to roadways, mature tree groves such as Recreation Grove Park, or views of the Little Lake Valley from U.S. 101, as described in Existing Conditions and illustrated in Figures 3.1a through 3.1d. An adverse effect would occur if development facilitated by the Land Use Element Update would block or otherwise damage the scenic vista.

The proposed Land Use Element would introduce new land use designations within the City and Proposed SOI Areas, which could change the intensity of development, potentially affecting scenic vistas enjoyed from viewpoints within Willits and the Planning Area. The proposed Land Use Element would also allow more intensive residential development within undeveloped wooded ridges along State Route 20 on the west side of Willits, allowing higher density residential development upon annexation than is currently allowed by the County General Plan. In addition, views of open agriculture, riparian corridors, and mature trees may be impacted by development that could be allowed by the Land Use Element. However, the Land Use Element does not include changes to land use for the Little Lake Valley east of U.S. 101 and includes policy County land use regulations that protect the viability of local agriculture in the Little Lake Valley (LU-8.5, Preserve Agricultural Lands), and therefore would not affect scenic vistas relating to the Little Lake Valley.

The West State Route 20 wooded hillslopes visible from S.R. 20 are generally designated for rural residential development at a density of one dwelling unit per acres by the County on the north side and for industrial uses on the south. The proposed City of Willits land use designation would maintain the industrial land use on the south side, but allow more intensive residential development, up to fifteen dwelling units per acre, on the north West State Route 20 hillslopes.

The Conservation and Open Space Element of the City of Willits General Plan recognizes wooded ridgelines, riparian corridors, and mature trees as visually important aspects of the City's aesthetics. In addition, the proposed Land Use Element contains a series of policies and implementation programs intended to limit adverse effects on scenic vistas and maintain the City's visual character and preserve its scenic resources. Applicable proposed goals and policies are as follows:

> LU-2.2, Infill Development. Land within areas of the City served by utilities, transportation infrastructure, and municipal services represent the best opportunity to support affordable housing and employment development, and to reduce greenhouse emissions. Encourage incremental development of vacant and underutilized infill areas that are appropriately scaled and enhances existing neighborhoods within the City. (Source: Existing Policy 1.230, modified)
>
> LU-2.4, Annexations. Monitor the supply of land within the City that is planned for residential, commercial, industrial, and public service uses and, as appropriate, encourage annexations of land adjacent to the City that support the preservation of open space lands, promote orderly development in a manner consistent with the General Plan and contribute to the City's fiscal stability, and that create a logical City boundary; result in the efficient use of City services and utilities; and support a transportation network that, in combination with an appropriate mix of land uses, minimizes vehicle trips by promoting walking, bicycling, and transit. (Source: Existing Policy 1.240, modified)
>
> LU-8.1,Riparian Buffer Areas. Streams, wetlands, and their associated riparian habitats should be conserved in areas planned for development. Require project applicants located adjacent to streams to include appropriate measures for natural occurring stream channel and native riparian vegetation preservation, appropriate measures to stabilize stream banks, and prevent erosion and the discharge of sediment. (Source: New Policy and relates to Conservation and Open Space Policies in Section 3.200 and Mitigation Measures 4.731 and 4.733)
>
> LU-8.4, Protect Oak Trees and Woodlands. Integrate important tree protections from the Urban Forest Management Plan into the Zoning Regulations and establish an oak tree and oak woodland retention and protection program for new development that emphasizes the avoidance, minimization, or mitigation of oak tree and oak woodlands removal. (Source: New Policy)
>
> LU-8.5, Preserve Agricultural Lands. The City shall discourage urban development on unincorporated land within its Sphere of Influence until annexed by the City. The City shall support County land use regulations that protect the viability of local agriculture in the Little Lake Valley. (Source: New Policy)

Land Use Element policies such as LU-2.2, Infill Development, and LU-2.4, Annexations, prioritize infill development and the preservation of open space lands. Goal LU-8, Protect Natural Resources within Areas Planned for Development, directs that important tree protections from the Urban Forest Management Plan are integrated into the Zoning Regulations to protect oak trees and woodlands, and implements expanded protections from the Conservation and Open Space Element to protect riparian areas, and discourage development of agricultural lands within the SOI. In addition, commercial and residential development are required to conform to the City's zoning and development standards (such as setbacks, height, and density) and site plan review requirements that are intended to reduce land use conflicts and ensure consistency with development standards.

Implementation of the Land Use Element could result in potential impacts from development within open and wooded hillslope areas, grading for roads and other developed areas, and the removal of mature

tree groves that contribute to visual quality. New development in areas such as the Baechtel Road land use change area (a change from Industrial-General (M-G) to Geneal Mixed-Use (GM-U)) may allow more intense future development within an undeveloped area containing a riparian area along Baechtel Creek, periodic grazing, and potential oak woodlands. Policies LU-8.1, Riparian Buffer Areas, and LU-8.4, Protect Oak Trees and Woodlands, and associated policies and implementations would enhance protections for riparian areas and oak woodlands and limiting potential impacts to scenic vistas from Baechtel Road.

Implementation of the Land Use Element could also result in potential impact the character of scenic vistas along State Route 20 west of Willits. There are 20 parcels ranging in size on 0.5 acres to 20 acres and averaging approximately five acres in the West State Route 20 wooded hillslopes visible from S.R. 20 that are planned for development, once annexed into the City of Willits, at densities of 15 dwelling units per acre. Development at densities greater than one unit plus one accessory unit per acre per parcel, in these areas, could not occur until subdivision is approved. However, the Land Use Element does not contain policies that would require that development on highly visible hillslopes be clustered or requiring that grading be minimized to protect scenic vistas. Therefore, this impact would be potentially significant, and mitigation would be required to minimize adverse effects on scenic vistas.

MITIGATION MEASURE

AES-1: New Land Use Element Policy in "Protect Natural Resources within Areas Planned for Development" Group

New Policy LU-8.X. Development in Hillside Scenic Areas. Require new development in hillside areas be sited and designed to retain the natural hillside setting by minimizing grading and other major disruptions of the natural slope areas. The City shall encourage clustered dwelling units in hillside areas to preserve the scenic character of the hillsides.

SIGNIFICANCE AFTER MITIGATION

With the addition of this new Land Use Element Policy through Mitigation AES-1, requiring clustered development, minimizing grading, and minimizing the removal of trees, potential adverse effects on a scenic vista would be reduced to less than significant levels.

Threshold AES-02: Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-02: No impact

There are no officially listed State Scenic Highways within the Project Area. However, a segment of S.R. 20 and a segment of U.S. 101 within the Project Area have been identified by Caltrans as eligible for potential listing. If the two eligible sections of S.R. 20 and U.S. 101 were to become designated State Scenic Highways, policies and programs under the Land Use Element would not damage the scenic resources that contributed to their listing as a State Scenic Highway.

The Circulation Element contains Policy 2.270, that promotes beautification efforts along the City's roadways and Policy 2.290, Coordinate local transportation planning with the California Department of Transportation and Mendocino County Proposed policies LU-5.1, LU-5.2, and Implementation Measure

LU-5A seek to improve the visual characteristics and safety of pedestrians within the proposed S.R. 20 section from South Street to Muir Mill Road. There are proposed areas of expanded SOI along the S.R. 20 corridor. These parcels are zoned primarily rural residential. As described above in AES-1, the General Plan and Land Use Element prioritize infill development and the protection of agricultural uses and open space. Mitigation AES-1 would strengthen these objectives by requiring that hillside development along S.R. 20 be clustered or sited to limit visual impact and that grading and tree removal of be minimized, further limiting the likelihood that the proposed project would damage scenic resources, including but not limited to, trees, rock outcroppings if S.R. 20 and U.S. 101 were to become designated State Scenic Highways.

Given that there are no designated state scenic highways within the Planning Area, the proposed project would not damage scenic resources within a state scenic highway. Consequently, the project would have no impact.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Threshold AES-03: In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-03: Implementation of the project would allow more intensive development of previously undeveloped areas within the City through rezoning and changes to land use and by expanding the City's Sphere of Influence to allow future annexations and development of previously undeveloped areas. The current General Plan and proposed Willits Land Use Element include goals and policies that are intended to protect visual quality, however the implementation of mitigation measures is required to reduce impacts to the visual character of undeveloped hillside areas to ***less than significant levels****.*

The City of Willits and SOI areas contain visually attractive urban and non-urban areas attractive city that contain views of scenic and visual resources such as wooden and open hillsides, the Little Lake Valley, and the Willits downtown area. Urban portions of the project area include the developed and undeveloped infill portions of the City of Willits, which is designated as an Urban Cluster by the Census Bureau, and non-urban portions of the Project Area include the sparsely developed or undeveloped SOI areas, such as the West SR 20, Cropley Lane, and the south east portion of Central Area and all of the Southern Estates Residential portion of the Locust Street SOI area. Portions of the City of Willits would also be considered non-urban, such as the areas along East Hill Street east of the railroad right of way and the City property north of East Commercial Street containing the recreational facilities and wastewater treatment plant.

Within the City of Willits, new and old neighborhoods are located throughout the City and are characterized by tree-lined streets and include a mix of housing. Commercial uses are mostly located on

Main Street and South Main Street, where Main Street commercial buildings reflect a traditional downtown and South Main Street is characterized by parking lots adjacent to the street and strip-style single and multi-tenant one-story commercial buildings. The non-urban areas contain low density rural residential development, a recreational vehicle park, low intensity industrial uses, and grazing areas and are surrounded by attractive wooded and open hillslopes.

The objective of the Land Use Element Update is to preserve the visual character in the City by prioritizing infill development and commercial of Downtown and South Main Street by improving important City gateways, encouraging the adaptive re-use of existing structures and applying design standards that improve the streetscape. Although an objective of the Land Use Element is to maximize opportunities for housing development to address the local, regional and statewide housing shortage, especially infill development within current city limits, the project would also define an expanded Sphere of Influence around the City for potential future residential development to help ensure an adequate City supply of developable land and to protect and conserve natural resources and avoid hazards. The project would also include increased residential densities and building intensities for certain land use designations, as well as the introduction of new mixed use land use designations, which could potentially alter Willits' visual character. Although implementation of these new land use designations may alter Willits' existing visual character, these designations would provide greater land use flexibility and better align existing land uses with corresponding designations. Additionally, these new land use designations would be implemented through changes to the City's Zoning regulations to ensure General Plan consistency.

For non-urban areas within the Project Area, the Land Use Element Policy LU-2.2, Infill Development. recognizes that within areas of the City served by utilities, transportation infrastructure, and municipal services represent the best opportunity to support affordable housing and employment development and encourage incremental development of vacant and underutilized infill areas that are appropriately scaled and enhances existing neighborhoods within the City prior to annexing areas within the SOI. Policy LU-2.4, Annexations, directs the City to monitor the land supply within the City and encourage annexation only as appropriate, when land supply constraints limit the City's ability to accommodate growth and when that support the preservation of open space lands, promote orderly development in a manner consistent with the General Plan.

The proposed Land Use Element contains a series of policies and implementation programs intended to ensure that development within the Project Area does not degrade the existing visual character of non-urbanized areas or conflict with applicable zoning and other regulations governing scenic quality in urbanized areas. Several goals and policies promote protection of visual character in non-urbanized land and promote applicable zoning in urbanized regions. Upon annexation, development in SOI areas would be subject to Land Use Element policies intended to preserve riparian areas (LU-8.1, Riparian Buffer Areas) and to protect oak woodlands (LU-8.4, Protect Oak Trees and Woodlands). In addition, all development within the must be consistent with the Conservation and Open Space which seeks to preserve and enhance the City's existing visual environment, encourages projects which clearly enhance the visual characteristics of the site and the surrounding area, specifies a development review process that would seek modifications in proposed plans which negate the adverse visual impacts or enhance the visual attributes of proposed development projects

Within the urban portions of the City to encourage mixed use development that would maintain the traditional downtown core of the City of Willits and incorporate design and streetscape planning documents that the City has prepared for this area in the past.

There are no specific Zoning and other regulations governing scenic quality in developed areas of Willits, although proposed Land Use Element Implementation Program LU-4A, Main Street Mixed-Use Zone, would establish design guidelines for the Main Street Mixed Use Zone and Program LU-5A, South Main Street Strategic Plan, implementing policy relating to South Main Street would develop and implement street design standards to enhance and beautify the streetscape and building frontages to support businesses and to provide a safer, and more enjoyable atmosphere. Given this, the proposed Project would not conflict with regulations governing scenic quality. However, the existing Conservation and Open Space Element Policy and proposed Land Use Element Update policies that relate to visual character may not adequately protect the visual character of the hillslopes in SOI areas such as the State Route 20 SOI area. As result, the proposed Land Use Element Update could degrade existing visual character or quality of public views in non-urban areas and impacts would be potentially significant. Impacts would be reduced to less than significant levels with the implementation of mitigation measures that cluster development, minimize grading and preserve trees and native vegetation that contribute to visual quality. Therefore, this impact would be potentially significant, and Mitigation Measure AES-1 would be required to minimize adverse effects to the visual character or quality of public views of the site and its surroundings.

MITIGATION MEASURE

Mitigation Measure AES-1

SIGNIFICANCE AFTER MITIGATION

Impacts to existing visual character or quality of public views would be less than significant with the implementation of mitigation AES-1.

Threshold AES-04: Would create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Impact AES-04: Policies and measures of the proposed Land Use Element promote infill and compatible development to minimize light or glare related impacts of new development. Although development allowed by the Project would temporarily and permanently introduce new sources of light and glare, through the implementation of Land Use Element policy and consistent Zoning amendments regulating lighting and glared for new development, impacts would be less than significant.

This impact analysis relates to light emissions generated by new stationary sources of light, such as street, exterior parking lot, and building security lighting; and moving sources of light, such as headlights of vehicles driving on roadways and driveways. Glare refers to intense light emanated directly from a source or indirectly when light reflects from a surface. Daytime glare is caused in large part by sunlight shining on highly reflective surfaces at or above eye level. Reflective surfaces area associated with buildings that have expanses of polished or glass surfaces, light-colored pavement, and the windshields of parked cars.

As described above in the Environmental Setting, the City is a developed area with open space areas, agricultural areas and forested hills along the boundaries. The light levels in Willits are moderately high in the developed areas, with streetlights, exterior building lighting, and lighted signs contributing to the lighting levels and lower in suburban areas. Development allowed by the Land Use Element Update

would be subject to City regulations that govern lighting, including Site Plan Review, which requires lighting be hooded or shielded so light or glare does not extend beyond the subject property or interfere with traffic or limit visibility. Zoning Regulations Section 17.50, Performance Standards, specifies that no land or building shall be used or occupied in a manner that creates glare and no direct or sky-reflected glare shall emanate from any establishment or use.

The proposed policies and goals of the Land Use Element are designed to facilitate new development of housing and employment related uses to accommodate future increases in the City's population. Development facilitated by the Land Use Element would be guided by existing City Zoning Regulations and amendments described in the Land Use Element implementation programs to make the Zoning consistent with the Land use Element Update. The Land Use Element Update policies prioritize infill development (LU-2.2, Infill Development), seek compatible development (LU-6.1, Limit Incompatible and Conflicting Uses and LU-6.2, Compatible Development) through siting and design requirements. Proposed implementation measure LU-6A, Zoning Regulations, modifies the Zoning Regulations to add performance standards for industrial and heavy commercial development adjacent to residential areas to provide buffers, landscaping, and screening that minimize noise, light, glare, and other impacts.

While the project would introduce new sources of light and glare to the City of Willits compared to existing conditions, new exterior lighting associated with future projects light and glare impacts would be lessened by the Land Use Element policies listed above that are implemented through amendments to the City's Zoning Regulations. Therefore, while the project would introduce new sources of light and glare to the City of Willits compared to existing conditions, new exterior lighting associated with future projects would be regulated by the Zoning Regulations, as amended, and light and glare impacts would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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3.2 AGRICULTURAL AND FORESTRY RESOURCES

This section summarizes agricultural and forestry resources in the Planning Area and analyzes the impacts related to agricultural and forestry resources due to the project.

ENVIRONMENTAL SETTING

A. DEFINITIONS

Agricultural Lands – There can be multiple legal definitions of what constitutes "agricultural lands" and "prime agricultural lands". The California Department of Conservation (DOC) develops Important Farmland Maps as part of its Farmland Mapping and Monitoring Program (FMMP) and includes the definitions for different types of Important Farmland. However, Federal, State, and local agencies all operate under different laws and requirements, each setting out different definitions of prime farmland. For instance, preserving prime agricultural land is a key statutory mandate of the Mendocino Local Agency Formation Commission (LAFCo) which is established under the Cortese–Knox–Hertzberg Local Government Reorganization Act of 2000 (CKH Act). LAFCo is a Responsible Agency under the California Environmental Quality Act (CEQA). Their definition of agricultural land is "land currently used for the purpose of producing an agricultural commodity for commercial purposes, land left fallow under a crop rotational program, or land enrolled in an agricultural subsidy or set-aside program". This definition and that of prime agricultural lands differ somewhat from the DOC definitions which are typically relied upon for CEQA analysis.

Prime Farmland – The DOC defines Prime Farmland as land that has the best combination of physical and chemical characteristics for producing crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming standards.

Prime Agricultural Land –The CKH Act defines prime agricultural land as land that has not been developed for any purpose other than agriculture and meets certain qualifications which include: (a) land that could be rated as class I or class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not it's currently irrigated, as long as irrigation is possible, (b) land that meets a Storie Index Rating between 80 and 100, (c) land that can support livestock used for food and fiber production, with a minimum annual carrying capacity equivalent to one animal unit per acre according to USDA guidelines, (d) land planted with fruit or nut-bearing plants that will yield at least $400 per acre annually during the commercial bearing period and have a nonbearing period of less than five years, and (e) land that has generated an annual gross value of agricultural products of at least $400 per acre for at least three out of the past five years.

Farmland of Statewide Importance – Similar to prime farmland, farmland of statewide importance is land that has a good combination of physical and chemical characteristics for producing crops but with minor shortcomings. Shortcomings examples include steeper slopes or soil with less ability to hold and store moisture. The land must have been used for irrigated crop production at some time during the two update cycles prior to the DOC mapping date.

Unique Farmland – Land with lesser quality soils used to produce specific high economic value crops. It has the special combination of soil quality, location, growing season and moisture supply needed to produce sustained high quality or high yields of a specific crop when treated and managed according to current farming methods. It is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Examples of crops include oranges, olives, avocados, rice, grapes and cut flowers.

Grazing Land – Land on which the existing vegetation is suited to the grazing of livestock. Grazing land is considered agricultural lands under the LAFCo definition.

Urban and Built-up Land – Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

Forest Land – Forest land is land that can support, under natural conditions, 10 percent native tree cover of any species, including hardwoods, and that allows for the preservation or management of forest-related resources such as timber, aesthetic value, fish and wildlife, biodiversity, water quality, recreational facilities, and other public benefits (PRC Section 12220(g))

Timberland – Timberland means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of tree of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species are determined by the board on a district basis (PRC Section 4526(g)).

Timberland Production Zones – Timberland production zones or "TPZ" means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h) (CGC Section 51104)

B. AGRICULTURE

The City of Willits is located within the Little Lake Valley area. The Little Lake Valley is approximately 8,300 acres generally comprised of the Little Lake groundwater basin, agricultural land, and rural residential development. According to the DOC Important Farmland Finder, land within the Little Lake Valley is primary Grazing Land and Other Land. Mendocino County General Plan Land use designations in this area include Forest Lands and Range Lands, with smaller areas planned Rural Residential, within the hill slopes north of East Hill Road and Agriculture and a small amount of Rural Residential land north of East Hill Road to the end of the Little Lake Valley near the Reynolds Highway.

Agricultural lands within the Little Lake Valley and the foothills west of the City of Willits are primarily utilized for the production of hay and livestock, most commonly sheep, cattle, and horses. The amount of land within and at the periphery of the Little Lake Valley utilized for the cultivation of cannabis is not known; however, the number of cannabis farms in the Little Lake Valley has continued to grow with the implementation of the Mendocino Cannabis Cultivation Ordinance, adopted April 4, 2017.

Within the Willits city limits there is no land planned or zoned for agricultural use. The General Plan allows for interim agricultural use of land planned for industrial uses and there are undeveloped industrial lands that are used for grazing and hay production. Within the Proposed Sphere of Influence there are a total of 9 parcels zoned Agricultural (AG) 40 with a total area of around 19 acres (East Valley Street Area) and that average approximately two acres in size and the largest of which is approximately 4 acres. A visual aerial assessment of these parcels suggests that a total of 6.85 acres consisting of multiple parcels may contain agricultural uses.

Based on USDA mapping information, there are approximately 306 acres of prime agricultural soils within parcels located within the Proposed SOI Areas, irrespective of currently General Plan Lan use

Designation, Zoning Classification, parcel use or development status. Some of these parcels may meet the criteria for Prime Agricultural Land as defined by LAFCo.

Regional History

Timber and agriculture were the mainstays of the County's economy from the 19th Century into the 20th, and in the 21st Century continue to remain important to both the economy and culture of Mendocino County, although the character of agriculture is changing. The County's timber industry faces increasing competition from worldwide sources of lumber that have made it difficult for local mills to remain competitive. The County's agricultural industry is seeing a shift from historic crops such as pears, apples, prunes, and livestock, to grapes and wine making, and cannabis in some areas of the County (LACO, 2020).

C. Forestry

The Planning Area does not have any areas that are zoned by Mendocino County as Timber Production or Forest Land, a zone applied to lands not zoned Timberland Production, but which have the present or future potential for timber production, intermixed smaller parcels and other contiguous lands, the inclusion of which is necessary for the protection of efficient management of timber resource lands. There are associated lumber processing and industrial activities within the existing SOI, but those are located on industrially zoned lots and would not be affected by land use designation changes implemented by the project.

There have been two Timber Harvesting Plans (THPs) approved by the CA Dept. of Forestry and Fire Protection, permitting timber harvest for commercial purposes on non-federal lands within the Planning Area. The Pinewood Gardens THP was conducted in the southeastern portion of the City's Planning Area from 2018-2022. Prior to that there was a Brooktrails THP conducted in the northern region of the City's Planning Area from 2014-2016. Timber Harvesting Plans (THPs) approved by the California Department of Forestry and Fire Protection, permitting timber harvest for commercial purposes on non-federal lands. Data and feature representations contribute to assessment of cumulative effects from timber harvesting in planning watersheds and support the planning, regulation, enforcement, and oversight of commercial timber harvesting on non-federal lands in California.

Regulatory Setting

Federal

Farmland Protection Policy Act

The Natural Resources Conservation Service (NRCS), a federal agency within the United States Department of Agriculture, is the agency primarily responsible for implementation of the Farmland Protection Policy Act (FPPA). The purpose of the FPPA is to minimize federal programs' contribution to the conversion of farmland to nonagricultural uses by ensuring that federal programs are administered in a manner that is compatible with state, local, and private programs designed to protect farmland. The NRCS provides technical assistance to federal agencies, state and local governments, tribes, or nonprofit organizations that desire to develop farmland protection programs and policies. Every year the NRCS summarizes FPPA implementation to Congress. The FPPA also established the Farmland Protection Program and Land Evaluation and Site Assessment.

Agricultural Conservation Easement Program (ACEP)

The Agricultural Conservation Easement Program (ACEP) is a federal program in the United States under the Natural Resources Conservation Service (NRCS) designed to provide financial and technical assistance to landowners and entities for conserving and protecting agricultural land and wetlands. ACEP consolidates three former programs: the Wetlands Reserve Program, Grassland Reserve Program and Farm and Ranch Land Protection Program. The program now consists of the Wetland Reserve Easements (WRE) program and the Agricultural Land Easements (ALE) program. The Agricultural Land Easements program, in turn, includes a Farmland Protection program. The program provides funding to purchase agricultural land easements from willing landowners. These easements are legal agreements that permanently limit the development and use of the land for non-agricultural purposes. While landowners retain ownership of the property, they agree not to develop it for purposes other than agriculture. The selection of properties for ACEP Farmland Protection easements is based on several criteria, including the agricultural significance of the land, the viability of the farming operation, the presence of prime or unique farmland soils, and the extent to which the easement would protect the land from development. ACEP Farmland Protection provides both federal and matching funds. The easements acquired through ACEP Farmland Protection are permanent, meaning that the land will remain in agricultural use in perpetuity. This helps safeguard the long-term viability of farming operations and preserves the land for future generations.

Land Evaluation and Site Assessment

The Land Evaluation and Site Assessment (LESA) system ranks lands for suitability and inclusion in the Farmland Protection Program. LESA evaluates several factors, including soil potential for agricultural use, location, market access, and adjacent land use. These factors are used to numerically rank the suitability of parcels based on local resource evaluation and site considerations. The LESA system has spawned many variations, including the California LESA model, described below.

STATE

California Farmland Conservation Program Act

The California Farmland Conservancy Program Act, also known as Senate Bill (SB) 1142, established the California Farmland Conservancy Program, which provides grants for agricultural conservation easements. An agricultural conservation easement aims to maintain agricultural land in active production by preventing development on the subject parcel and prohibiting practices that would damage or interfere with the agricultural use of the land. Because the easement is a restriction on the deed of the property, the easement remains in effect even when the land changes ownership. While other benefits may accrue because the land is not developed (scenic and habitat values, for example), the primary use of the land is agricultural. Easements funded by the California Farmland Conservancy Program must be of a size and nature suitable for viable commercial agriculture.

LAFCo - Cortese–Knox–Hertzberg Local Government Reorganization Act

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 is a California state law that outlines procedures and regulations and created a LAFCo, or Local Agency Formation Commission, in each county to regulate the reorganization of local government entities. It aims to provide a structured process for the consolidation, merger, annexation, or dissolution of cities and special districts. LAFCOs primary focus is to: discourage urban sprawl, encourage orderly governmental boundaries, and to preserve open-space and prime agricultural lands.

The Mendocino LAFCo Policies and Procedures Manual in Section 10 defines local policies relating to the establishment of local agency spheres of influence (SOI). According to these policies, an SOI is the

probable 20-year growth boundary for a jurisdiction's physical development. The Mendocino LAFCo uses SOIs to:

a) promote orderly growth and development within and adjacent to communities;
b) promote cooperative planning efforts among cities, the County, and special districts to address concerns regarding land use and development standards, premature conversion of agriculture and open space lands, and efficient provision of public services;
c) guide future local government reorganization that encourages efficiency, economy, and orderly changes in local government; and
d) assist property owners in anticipating the availability of public services in planning for the use of their property.

Additional Mendocino LAFCo SOI policies include 10.1.7 Agriculture and Open Space Lands, which states that territory not in need of urban services, including open space, agriculture, recreational, rural lands, or residential rural areas shall not be assigned to an agency's sphere of influence unless the area's exclusion would impede the planned, orderly and efficient development of the area. In addition, 10.1.8 Annexations Are Not Mandatory, states that territory within an agency's sphere will not necessarily be annexed. A sphere is only one of several factors that are considered by LAFCo when evaluating changes of organization or reorganization.

In approving SOIs, the Mendocino LAFCo must prepare a written statement of its determinations with respect to each of the following criteria (Government Code 56425(e)):

(1) The present and planned land uses in the area, including agricultural and open-space lands.
(2) The present and probable need for public facilities and services in the area.
(3) The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.
(4) The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency.
(5) For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, that occurs pursuant to subdivision (g) on or after July 1, 2012, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

California Land Evaluation and Site Assessment Model

The California LESA model was developed in 1997 and was designed based on the federal LESA system and can be used to rank the relative importance of farmland and the potential significance of its conversion on a site-by-site basis. The California LESA model considers the following factors: land capability, Storie index soil rating system, water availability (drought and non-drought conditions), land uses within one-quarter mile, and "protected resource lands" (e.g., Williamson Act lands) surrounding the property. A score can be derived and used to determine if the conversion of a property would be significant under CEQA. The LESA model provides a broad range of scores and other factors that can be considered in determining impact significance.

Williamson Act

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is a nonmandated state program administered by counties and cities to preserve agricultural land and discourage the premature conversion of agricultural land to urban uses. The act authorizes local governments and property owners to (voluntarily) enter into contracts to commit agricultural land to specified uses for 10 or more years. Once restricted, the land is valued for taxation based on its agricultural income rather than unrestricted market value, resulting in a lower tax rate for owners. In return, the owners guarantee that these properties remain under agricultural production for an initial 10-year period. The contract is renewed automatically unless the owner files a notice of nonrenewal, thereby maintaining a constant 10-year contract. It persists as a popular program statewide with ninety percent of the state's counties enrolled and 13.6 million acres of land in protection with just over one third of those being prime farmland. Participation is on a voluntary basis by both landowners and local governments and is implemented through the establishment of agricultural preserves and the execution of Williamson Act contracts.

Termination of a Williamson Act contract through the nonrenewal process is the preferred method to remove the enforceable restriction of the contract. Cancellation is not appropriate when objectives served by cancellation could be served by nonrenewal. Cancellation is reserved for unusual, “emergency” situations. In order to approve tentative cancellation, a board or council must make specific findings based on substantial evidence that a cancellation is consistent with the purposes of the act or in the public interest. Contracts can specify that both findings must be made in order to approve tentative cancellation.

Important Farmland Inventory System and Farmland Mapping and Monitoring Program

The Important Farmland Inventory System initiated in 1975 by the U.S. Soil Conservation Service (now NRCS) classifies land based on 10 soil and climatic characteristics. The Department of Conservation started a similar system of mapping and monitoring for California in 1980, known as the Farmland Mapping and Monitoring Program (FMMP). Under the California Environmental Quality Act (CEQA), the lead agency is required to evaluate agricultural resources in environmental assessments at least in part based on the FMMP. The state’s system was designed to document how much agricultural land in California was being converted to nonagricultural land or transferred into Williamson Act contracts.

Z’berg-Nejedly Forest Practice Act

The California Department of Forestry and Fire Protection (CalFire) enforces the laws that regulate logging on privately owned lands in California. These laws are found in the Forest Protection Act, enacted in 1973 to ensure that logging is done in a manner that preserves and protects fish, wildlife, forests, and streams. Each year CalFire foresters review on average 500 to 1,400 Timber Harvesting Plans (THPs), which are submitted by private landowners and logging companies who want to harvest their trees. The foresters also conduct over 6,500 site inspection each year. The reviews and inspections ensure protection of watersheds and wildlife, as well as renewal of timber resources. Article 8 of the Forest Practice Act requires timber operators observe fire prevention and control rules and to annually submit a fire suppression resources inventory to CalFire.

Assembly Bill 2881 – Right-to-Farm Disclosure

Assembly Bill (AB) 2881 was passed by the State Legislature in 2008 and became effective January 1, 2009. This bill requires that as a part of real estate transactions, land sellers and agents must disclose whether the property is located within 1 mile of farmland as designated on the most recent Important Farmland Map. Any of the five agricultural categories—Prime Farmland, Farmland of Statewide

Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land—on the map qualifies for disclosure purposes.

California Forest Taxation Reform Act

The California Forest Taxation Reform Act of 1976 made significant modifications to the manner in which annual property taxes for timber and timberlands are assessed in California. The act placed values on bare land that are related to its ability to grow trees, and it substituted a percentage tax on the value of timber at the time of harvest ("yield" tax) for the annual property tax on the trees. In exchange for this tax benefit, landowners had to be willing to dedicate their timberland to timber growing and compatible uses for a period of at least 10 years. Unless terminated by the county or landowner, these zones renew each year, thus creating a rolling minimum or self-perpetuating 10-year commitment. Lands zoned in this manner are called Timberland Production Zones. Total acres of Timberland Production Zones indicate land that is committed to timber growing and compatible uses, thus forming the long-term productive base of the state's privately owned forestland.

California Public Resources Code

California Public Resources Code (PRC) Sections 12220(g) and 4789.2(g) and California Government Code (CGC) Section 51104(g) define forestry resources including forestland, timberland, and timberland production zones.

Regional and Local

Mendocino County Ordinances

Chapter 10 of the Mendocino County Code of Ordinances regulates agriculture for unincorporated regions of the County. Any property that is zoned "Agricultural Land" or is located within three hundred feet of land with that zoning cannot be sold without prospective buyers being informed of their zoning due to the potential inconvenience or discomfort to the residents (Ord. No. 3414, adopted 1983, as amended by Ord. No. 3463, adopted 1983.). The County prioritizes farm operations in these areas and normal necessary agricultural activities could inconvenience neighboring residents with dust, noise, odor, and the use of agricultural chemicals operations.

Willits General Plan

The Willits General Plan Land Use Element contains the "Agricultural - General (A-G)" Land Use Designation, which is intended to be applied to areas which are suitable for agricultural production because of historical use or future potential based on soil capability, and the Residential-Suburban (R-S) Land Use Designation, which identifies limited livestock raising and agriculture as a compatible use. General Plan Land Use Element Policy 1.290 encourages agricultural activities on lands designated for industrial use until such time as the lands are utilized for industrial purposes.

Willits Municipal Code

The Willits Zoning Regulations Section 17.04.070 defines "agriculture" as the use of the land for agricultural purposes, including farming, dairying, pasturage, agriculture, apiaries, horticulture, floriculture, viticulture, and animal and poultry husbandry, and the necessary accessory uses for packing, processing, treating or storing the produce; provided, however, that the operation of any such accessory uses shall be secondary to that of normal agricultural activities; and, provided further, that the previously mentioned uses shall not include the commercial feeding of garbage or offal to swine or other animals. The Agricultural (A) zone classification, Section 17.10, is intended to preserve lands best suited for

agricultural use from the encroachment of incompatible uses, and to preserve in agricultural use land suited to eventual development in other uses, pending proper timing for the economical provisions of utilities, major streets and other facilities, so that compact, orderly development will occur. In addition, the general agriculture use is principally or conditionally permitted in a number of Zones, including Residential Estates, Single-Family Residential, Residential Medium-Density, Limited Industrial, Heavy Industrial, Industrial Park, and Unclassified. The Open Space (OS) zone which is intended to conserve land in its natural state or designate it as open space buffer areas, where conditionally permitted uses are limited to recreational or general agricultural activities.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS/METHODOLOGY

According to Appendix G of the CEQA Guidelines, impacts related to agricultural and forestry resources from implementation of the project would be significant if it would:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
d) Result in the loss of forest land or conversion of forest land to non-forest use?
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Agricultural and forestry impact assessments involved a review of data available through analysis of Department of Conservation's FMMP maps, NCRS soils maps, aerial maps, as well as County forest land and Williamson Act Land maps provided by the County of Mendocino. An adverse effect would occur if a proposed development would have an impact on existing, mapped agricultural or forest land.

PROJECT IMPACTS AND MITIGATION

Threshold AG-01 – Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Impact AG-01: No impact

The Planning Area does not contain mapped Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. DOC Farmland Mapping and Monitoring Program maps show Grazing Land, Other Land, and Urban and Built-Up Land within the Planning Area and do not show any Important Farmland categories within the Planning Area. As such, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Threshold AG-02: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Impact AG-02: Implementation of the project would apply non-agricultural land use designations to 18.9 acres of land planned and zoned for agricultural use by Mendocino County within the proposed annexation areas; however, only a small portions of developed parcels may contain agricultural activities and the proposed land use designations are intended to reflect the current use of the property. With proper implementation of the Land Use Elements and planning prior to possible annexation of SOI, impacts would be less than significant.

There are no lands zoned for agricultural use within City Limits. Within the proposed Sphere of Influence, there are nine parcels totaling 18.9 acres that Mendocino County has zoned Agricultural, 40-acre minimum parcel size (A-G-40), located along a 0.25 mile stretch of East Valley Street between the City boundary and U.S. 101. Parcels range in size from less than ¼ acre (right of way parcel) to four acres. All parcels are improved with single family residences or industrial development, except for the small right of way parcels. Four of the parcels are owned by public agencies, the City of Willits, and Mendocino County. All other parcels, except for two adjacent and developed parcels are separately owned. Approximately 4.2 acres of two adjoining parcels totaling 5.43 acres owned in common, including a horse pasture that may also be used for hay production, horse paddocks and sheds, and a small arena and would be considered consistent with agricultural uses from aerial assessment. The project proposes to expand the City's SOI in the following areas currently zoned AG by the County and to change its land use designation as detailed in the table below.

Table 3.3a: East Valley Street Sphere of Influence Land Use Designation Changes

APN	Use Description	Mendocino County		Proposed Willits General Plan	Total Acres
		General Plan	Zone		
007-031-03	Right-of-Way	AG 40	AG	A-G	0.18
007-031-07	Single Family Residential	AG 40	AG	R-M	0.69
007-031-13	Single family dwelling and horse pasture	AG 40	AG	A-G	4.11
007-031-16	Right-of-Way	AG 40	AG	A-G	0.18
007-032-01	Co of Mendocino Public Works yard	AG 40	AG	M-G	2.19
007-032-02	Co of Mendocino Public Works facility and yard	AG 40	AG	M-G	2.81
007-032-03	Parking area, horse stable or paddock	AG 40	AG	A-G	1.32
007-032-04	Shipping business	AG 40	AG	M-G	3.38
007-040-17	Single Family Residential	AG 40	AG	R-L	2.74

Most of these proposed land use changes update the zoning to reflect current existing use of the properties. For instance, one property (APN 005-190-14) on the west edge of the proposed East Valley Street sphere of influence is owned by Mendocino County and is currently zoned low density residential (A-G) but is proposed to be planned Public Service (P-S) land. This Land Use Designation change reflects current existing land use of the property which includes a building for Mendocino County public services and a parking lot. The neighboring property is less than one acre and also zoned A-G (APN 007-031-07) and contains a single-family dwelling which is proposed to be planned R-M, Residential Medium Density, like the current land use designation of the five adjacent parcels to the east. As these proposed land use zoning changes do not change the current use, they will have no new impact on any existing agricultural use on the property or potential adjacent agricultural activities.

On the east side of the proposed East Valley SOI (APNs 007-032-01 007-032-012 and 07-032-04) there are three properties developed with industrial-like uses (public works building and yard and a transportation company), two of which are owned by Mendocino County, which are reflected by the proposed land use designation Industrial-General. These proposed land use zoning changes do not change the current use as well, they will have no new impact on any current agricultural activities on the property or potential adjacent agricultural activities.

The remaining properties zoned A-G (40) contain single family homes on large lots with pastures that appear to be used for grazing horses and are proposed to be designated Agricultural-General (A-G). Two parcels zoned A-G (APN 007-031-16 and 007-031-03) are right of way parcels owned by the City of Wilits and provide access from east Valley Street to the City owned rodeo grounds. However, the size of the undeveloped properties and their use as a City right of way limit their uses and ability to be used for agriculture. The largest parcel in this area is (APN 007-031-13) 4.1 acres and contains a residence, horse pasture or grazing land/hay, and other structures that appear to be related to the keeping of horses.

There are no properties enrolled in the Williamson Act that are proposed to be included within expanded Sphere of Influence areas. A parcel outside of the proposed Locust Street Sphere of Influence areas (APN 038-240-01) is enrolled in the Williamson Act land and surrounded on three sides by land currently planned and zoned for suburban residential development by Mendocino County that comprises the Sherwood Valley Rancheria and proposed Locust Street - Central Area and Southern Estates Residential SOIs. It should also be noted that the Locust Street passes through the Central Area and Southern Estates Residential proposed spheres of influence and provides access to this property.

The proposed Land Use Element contains a series of policies and implementation programs intended to ensure that development within the Project Area does not have substantial adverse effects on farmland. The Land Use Element intends to maintain General Plan consistency with existing agricultural uses and adjacent Williamson Act properties outside of the proposed SOI, where Policy LU-2.4 would encourage annexations of land adjacent to the City that support the preservation of open space lands, as appropriate. Policy LU-6.4, Interim Agricultural Uses, which encourages agricultural activities on large vacant properties until ands are utilized for their intended purposes. Were the City to annex any of these proposed SOI, The properties in the proposed SOI that contain agricultural activities would be annexed in a manner that preserves the agricultural activities, in order to be consistent with LAFCo law. Given that there is the potential to convert land currently used for agricultural purposes to a non-agricultural uses, and that land adjacent to the proposed SOI is enrolled in the Williamson Act and the potential future annexation and development of SOI land could increase the likelihood that these lands may be converted to non-agricultural uses, the proposed land uses in the Sphere of Influence area represent a potentially significant environmental effect that requires mitigation.

MITIGATION MEASURE

AG-01: **Proposed New Policy: Annexation Planning.**

New Policy LU-2.X. Discourage urban development within the City's Sphere of Influence until such lands are annexed by the City and support County land use regulations that protect the viability of local agriculture in the Little Lake Valley. When considering proposals for annexation, protect designated open space land and existing agricultural activities.

SIGNIFICANCE AFTER MITIGATION

LAFCo law would require the City to identify any "prime agricultural land" as defined by Government Code 56064 to be identified during annexation planning and protected or appropriate mitigations for the conversion of such lands. Mitigation AG-01: Proposed New Policy: Annexation Planning adds a requirement that, when the City is considering proposals for annexation, designated open space land and existing agricultural activities must be protected This proposed policy adds consideration of open space preservation to existing annexation policy considerations. Proper planning in these proposed SOI areas by the City prior to annexation would result in less than significant impacts.

Threshold AG-03: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Impact AG-03: No impact

There are no existing areas zoned as timberland or timberland production zones within the Planning Area, so therefore no impacts are expected to occur from implementation of the project.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Threshold AG-04: Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Impact AG-04: No impact

There are no forest lands involved in the Planning Area, so no impacts would occur from implementation of the project.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Threshold AG-05: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Impact AG-05: The Planning Area may include potential agricultural activities in portions of the proposed SOI. For these areas to be annexed an analysis of potential impacts to "prime agricultural land" pursuant to LAFCo law must occur and project-specific CEQA review. With the incorporation of mitigation measures, impacts would be less than significant.

As above noted, there are no forestlands within the Planning Area. However, some of the areas within proposed SOI as well as some properties within Land Use change areas changes may contain some level of agricultural activities. Certain areas within the Locust Street Central and Southern Estates area, West State Route 20 SOI, East Valley Street SOI, and Cropley Lane Industrial SOI appear to contain hay production and animal grazing. Small areas of pastureland potentially used for on-site horse feed or fodder also potentially occur in the Locust Street SOI and Mill Creek Drainage SOI. Additionally, grazing activities sporadically occur in the northeast portion of the Proposed Baechtel Road Land Use Change Area.

Prime farmland if irrigated, and prime farmland if irrigated and drained, is present within the Planning Area, City boundaries, and Proposed Sphere of Influence Areas. Areas within the City containing prime farmlands are planned for development or public facilities, except for an area on the southeast side of the City on the east side of U.S. 101, which is planned Open Space – Recreation. Many of the proposed land use change areas within the City overlay prime soils. In these instances, the proposed land use changes are from one land use designation that allows development to another. In many instances the proposed land use designation is intended to best reflect the actual use of land. There are some instances where prime agricultural soil is present, and the land is vacant. Prime agricultural soils are present in the northeast portion of the Proposed Baechtel Road Land Use Change Area where the Land Use Designation would change from Industrial-General to General Mixed Use. Grazing activities periodically occur in this area and the existing Land Use Element allows agriculture as an interim use of industrial land. Given the above, with one exception, parcels with prime agricultural soils within the City of Willits are planned for development and no proposed land use changes within the City would convert prime agricultural soils from an agricultural use to a nonagricultural use.

The proposed Land Use Element contains a series of policies and implementation programs intended to ensure that development within the Project Area does not have substantial adverse effects on farmland. In particular, Policies LU-2.2, Infill Development, prioritizes incremental growth within infill and redevelopment sites near neighborhood commercial areas and LU-2.4, Annexations, encourage annexations of land adjacent to the City that support the preservation of open space lands., as appropriate based on ongoing monitoring of the land supply within the City. Policy LU-8.5, Preserve Agricultural Lands, discourages urban development on unincorporated land within its Sphere of Influence until annexed by the City and specifies that the City shall support County land use regulations that protect the viability of local agriculture in the Little Lake Valley.

Any future annexations of the proposed SOI must identify any land that meets the definition of prime agricultural land contained in Government Code Section 56064. The evaluation process involves a comprehensive review of various factors including land classification, to ascertain whether the parcel(s) have undergone development for uses other than agriculture, with additional consideration for any of the following criteria: the land is prime, if (1) it is irrigated and Land Capability Classification (LCC) class 1 or 2, (2) rates 80 -100 on the Storie Index Rating, (3) supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre, (4) planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return $400 per acre, (5) has returned from the production of unprocessed agricultural plant products an annual gross value of not less than four hundred dollars ($400) per acre for three of the previous five calendar years. The first criteria regarding LCC is the most critical to examine and might even preclude the second criteria regarding the Storie Index. In the event of an annexation proposal, as part of the application and CEQA review, the City will need to evaluate whether some or all of the proposed annexation qualifies as “Prime agricultural land, " based on if the property not been developed for a use other than an agricultural use, and whether or not the soils or the forage growing within the area would support agriculture, or if existing agricultural activities generate a certain level of farm income.

The following table identifies each parcel within the Proposed SOI Area that contains prime soils if irrigated or prime soils if irrigated and drained as mapped by the USDA Natural Resources Conservation Service and displays the County of Mendocino General Plan Land Use Designation and Zone, a description of the use of the property or property characteristics from the Mendocino County Assessor that may be modified if incorrect or overly general. The total acres of each parcel is shown as well as the acres of that parcel that contain prime soils.

Table 4.3b: Use of Parcels in SOI with Prime Soils

Proposed SOI Area Name	APN	Use Description	Mendocino County		Proposed Willits General Plan	Prime Acres	Total Acres	% Prime
			General Plan	Zone				
Muir Mill Road	007-220-07	Church	SR	R3	R-L	0.66	0.86	77%
East Valley Street	005-190-14	Co of Mendocino office	AG40	AG	P-S	1.28	1.30	98%
East Valley Street	007-031-03	Right-of-Way	AG40	AG	A-G	0.18	0.18	100%
East Valley Street	007-031-07	Single Family Residential	AG40	AG	R-M	0.69	0.69	100%
East Valley Street	007-031-08	Single family dwelling and horse pasture	SR	R3	R-M	3.43	3.45	100%
East Valley Street	007-031-09	Single Family Residential	SR	R3	R-M	0.21	0.21	100%
East Valley Street	007-031-10	Single Family Residential	SR	R3	R-M	0.15	0.15	100%
East Valley Street	007-031-11	Single Family Residential	SR	R3	R-M	0.13	0.13	100%
East Valley Street	007-031-12	Single Family Residential	SR	R3	R-M	0.16	0.16	100%
East Valley Street	007-031-13	Single family dwelling and horse pasture	AG40	AG	A-G	4.09	4.11	100%

Proposed SOI Area Name	APN	Use Description	Mendocino County		Proposed Willits General Plan	Prime Acres	Total Acres	% Prime
			General Plan	Zone				
East Valley Street	007-031-16	Right-of-Way	AG40	AG	A-G	0.18	0.18	100%
East Valley Street	007-032-01	Co of Mendocino Public Works yard	AG40	AG	M-G	2.18	2.19	99%
East Valley Street	007-032-02	Co of Mendocino Public Works facility and yard	AG40	AG	M-G	2.79	2.81	99%
East Valley Street	007-032-03	Parking area, horse stable or paddock	AG40	AG	M-G	1.32	1.32	100%
East Valley Street	007-032-04	Shipping business	AG40	AG	M-G	3.38	3.38	100%
East Valley Street	007-040-17	Single Family Residential	AG40	AG	A-G	2.71	2.74	99%
Locust Street-Northern Urban Service Area	038-211-01	Manufactured Home-Real Property	SR	SR	R-L	0.47	0.98	48%
Locust Street-Northern Urban Service Area	038-211-02	Single Family Residential	SR	SR	R-L	0.56	0.78	72%
Locust Street-Northern Urban Service Area	038-211-03	Single Family Residential	SR	SR	R-L	0.54	0.78	69%
Locust Street-Northern Urban Service Area	038-211-04	Manufactured Home-Real Property	SR	SR	R-L	0.54	0.81	67%
Locust Street-Northern Urban Service Area	038-211-05	Manufactured Home-Real Property	SR	SR	R-L	0.26	0.40	65%
Locust Street-Northern Urban Service Area	038-211-06	Manufactured Home-Real Property	SR	SR	R-L	0.39	0.39	99%
Locust Street-Northern Urban Service Area	038-211-07	Single Family Residential	SR	SR	R-L	0.10	0.38	25%
Locust Street-Northern Urban Service Area	038-212-02	Manufactured Home-Real Property	SR	SR	R-L	0.21	0.21	100%
Locust Street-Northern Urban Service Area	038-212-04	Single Family Residential	SR	SR	R-L	0.05	0.19	24%
Locust Street-Northern Urban Service Area	038-212-06	Single Family Residential	SR	SR	R-L	0.07	0.21	33%
Locust Street-Northern Urban Service Area	038-212-07	Single Family Residential	SR	SR	R-L	0.47	0.59	80%
Locust Street-Northern Urban Service Area	038-212-08	Manufactured Home-Real Property	SR	SR	R-L	0.00	0.23	0%

Proposed SOI Area Name	APN	Use Description	Mendocino County		Proposed Willits General Plan	Prime Acres	Total Acres	% Prime
			General Plan	Zone				
Locust Street-Northern Urban Service Area	038-212-22	Riparian area	SR	SR	R-L	0.02	0.02	99%
Locust Street-Northern Urban Service Area	038-212-23	Manufactured Home-Real Property	SR	SR	R-L	0.42	0.47	90%
Locust Street-Northern Urban Service Area	038-212-25	Vacant Residential	SR	SR	R-L	0.15	0.87	17%
Locust Street-Northern Urban Service Area	038-212-26	Vacant Residential	SR	SR	R-L	0.15	0.16	98%
Locust Street-Northern Urban Service Area	038-213-03	Single Family Residential	SR	SR	R-L	0.05	0.29	17%
Locust Street-Northern Urban Service Area	038-213-04	Single Family Residential	SR	SR	R-L	0.05	0.93	5%
Locust Street-Northern Urban Service Area	038-213-10	Manufactured Home-Real Property	SR	SR	R-L	0.07	0.36	20%
Locust Street-Northern Urban Service Area	038-213-15	Single Family Residential	SR	SR	R-L	0.03	0.27	11%
Locust Street-Northern Urban Service Area	038-214-03	Single Family Residential	SR	SR	R-L	0.02	0.25	6%
Locust Street-Northern Urban Service Area	038-214-06	Single Family Residential	SR	SR	R-L	0.04	0.97	4%
Locust Street-Northern Urban Service Area	038-214-08	Manufactured Home-Real Property	SR	SR	R-L	0.15	2.03	8%
Locust Street-Northern Urban Service Area	038-220-04	Manufactured Home-Real Property	SR	SR	R-L	0.43	0.43	100%
Locust Street-Northern Urban Service Area	038-257-04	Single Family Residential	SR	SR	R-L	0.00	0.09	4%
Locust Street-Northern Urban Service Area	038-257-05	Single Family Residential	SR	SR	R-L	0.02	0.32	7%
Locust Street-Northern Urban Service Area	038-257-08	Vacant Residential	SR	SR	R-L	0.00	0.37	0%
Locust Street-Northern Urban Service Area	038-260-02	Single Family Residential	SR	SR	R-L	0.32	0.32	100%
Locust Street-Northern Urban Service Area	038-260-07	Single Family Residential	SR	SR	R-L	0.27	0.27	100%

Proposed SOI Area Name	APN	Use Description	Mendocino County		Proposed Willits General Plan	Prime Acres	Total Acres	% Prime
			General Plan	Zone				
Locust Street-Northern Urban Service Area	038-260-09	Vacant Residential	SR	SR	R-L	0.20	0.20	100%
Locust Street-Northern Urban Service Area	038-260-11	Manufactured Home-Real Property	SR	SR	R-L	0.42	0.42	100%
Locust Street-Northern Urban Service Area	038-260-12	Manufactured Home-Real Property	SR	SR	R-L	1.13	1.35	84%
Locust Street-Central Area	038-220-02	Single Family Residential, possible horse or cattle grazing and hay production	SR	SR	R-M	9.80	9.89	99%
Locust Street-Central Area	038-220-03	Single Family Residential, possible horse or cattle grazing and hay production and greenhouses	SR	SR	R-M	9.22	9.38	98%
Locust Street-Central Area	038-230-02	Single Family Residential, possible horse or cattle grazing and hay production	SR	SR	R-M	6.31	10.01	63%
Locust Street-Central Area	038-230-03	Single Family Residential, possible horse or cattle grazing and hay production and greenhouses	SR	SR	R-M	4.48	4.48	100%
Locust Street-Central Area	038-230-04	Right-of-Way	SR	SR	R-M	3.00	5.58	54%
Locust Street-Central Area	038-260-03	Single Family Residential, possible horse or cattle grazing and hay production and greenhouses	SR	SR	R-M	4.40	4.64	95%
Locust Street-Central Area	038-260-05	Riparian area	SR	SR	R-M	0.69	0.69	100%
Locust Street-Central Area	038-260-13	Single Family Residential, possible horse or cattle grazing and hay production	SR	SR	R-M	2.71	3.30	82%
Locust Street-Central Area	038-260-14	Manufactured Home-Real Property	SR	SR	R-M	8.21	8.22	100%
Locust Street-Central Area	038-260-15	Riparian area, small field	SR	SR	R-M	0.94	0.94	100%

Proposed SOI Area Name	APN	Use Description	Mendocino County		Proposed Willits General Plan	Prime Acres	Total Acres	% Prime
			General Plan	Zone				
Locust Street-Central Area	038-270-01	Single Family Residential	SR	SR	R-M	0.70	0.70	100%
Locust Street-Central Area	038-270-02	Single Family Residential, possible horse or cattle grazing and hay production	SR	SR	R-M	9.23	9.23	100%
Locust Street-Central Area	038-270-03	Single Family Residential, possible horse or cattle grazing and hay production	SR	SR	R-M	9.50	9.50	100%
Locust Street-Central Area	038-280-01	Possible horse or cattle grazing and hay production	SR	SR	R-M	7.17	7.17	100%
Locust Street-Central Area	038-280-02	Riparian area	SR	SR	R-M	0.20	0.20	100%
Locust Street-Central Area	038-280-03	Riparian area	SR	SR	R-M	0.61	0.61	100%
Locust Street-Central Area	038-280-04	Single Family Residential, possible horse or cattle grazing and hay production	SR	SR	R-M	8.01	8.89	90%
Locust Street-Central Area	038-460-05	Possible horse or cattle grazing and hay production	SR	SR	R-M	4.26	8.53	50%
Locust Street-Southern Estates Residential	007-220-04	Auto repair businesses and open yard area	SR	SR	M-G	6.67	9.55	70%
Locust Street-Southern Estates Residential	038-240-04	Manufactured Home-Real Property	SR	SR	R-S	0.01	0.44	1%
Locust Street-Southern Estates Residential	038-240-18	Single Family Residential	SR	SR	R-L	0.03	0.71	4%
Locust Street-Southern Estates Residential	038-240-22	Single Family Residential	SR	SR	R-S	0.05	1.05	5%
Locust Street-Southern Estates Residential	038-460-01	Possible horse or cattle grazing and hay production	SR	SR	R-L	0.15	1.32	11%
Locust Street-Southern Estates Residential	038-460-02	Possible horse or cattle grazing and hay production	SR	SR	R-S	0.38	1.74	22%

Proposed SOI Area Name	APN	Use Description	Mendocino County		Proposed Willits General Plan	Prime Acres	Total Acres	% Prime
			General Plan	Zone				
Locust Street-Southern Estates Residential	038-460-03	Possible horse or cattle grazing and hay production	SR	SR	R-S	0.44	1.58	28%
Locust Street-Southern Estates Residential	038-460-04	Possible horse or cattle grazing and hay production	SR	SR	R-S	0.80	4.42	18%
Locust Street-Southern Estates Residential	038-470-05	Single Family Residential, possible horse or cattle grazing and hay production	SR	SR	R-L	0.77	26.12	3%
Locust Street-Sherwood Valley Rancheria	038-130-27	Vacant Residential	SR	SR	C-G	17.17	58.43	29%
West St Rt 20	038-170-02	Vacant Residential	PL	PF	R-L	0.44	11.02	4%
West St Rt 20	038-170-09	Manufactured Home-Real Property	RR5	RR	R-L	0.09	2.13	4%
West St Rt 20	038-170-32	Single Family Residential	RR5	RR	R-L	0.48	4.13	12%
West St Rt 20	038-170-35	Single Family Residential	RR5	RR	R-L	0.02	5.28	0%
West St Rt 20	038-170-40	Manufactured Home-Real Property	RR5	RR	R-L	0.06	7.75	1%
West St Rt 20	038-170-41	Church	RR5	RR	R-L	0.26	1.33	20%
West St Rt 20	038-170-43	Single Family Residential	RR5	RR	R-L	0.02	4.50	1%
West St Rt 20	038-180-04	Single Family Residential, possible horse or cattle grazing and hay production	RMR40	UR	R-S	10.85	12.72	85%
West St Rt 20	038-180-05	Paved parking area	I	I2	M-G	0.79	0.79	100%
West St Rt 20	038-180-06	Light Manufacturing	I	I2	M-G	5.55	5.59	99%
West St Rt 20	038-180-19	Manufactured Home-Real Property	RMR40	UR	R-S	0.26	0.30	85%
West St Rt 20	038-180-25	Vacant Residential	I	I2	M-G	0.68	0.68	100%
West St Rt 20	038-180-26	Single Family Residential	RMR40	UR	R-S	0.43	0.43	100%
West St Rt 20	038-180-27	Riparian area	RMR40	UR	R-S	3.77	3.83	98%
West St Rt 20	038-180-34	RV park	RMR40	UR	C-G	4.31	40.84	11%

Proposed SOI Area Name	APN	Use Description	Mendocino County		Proposed Willits General Plan	Prime Acres	Total Acres	% Prime
			General Plan	Zone				
West St Rt 20	038-180-40	Single Family Residential	RMR40	UR	R-L	0.76	0.76	100%
West St Rt 20	038-180-41	Single Family Residential	RMR40	UR	R-L	0.43	0.53	82%
West St Rt 20	038-180-51	Possible horse or cattle grazing	RR5	RR	R-L	2.47	31.71	8%
West St Rt 20	038-180-53	Open land containing fill and aggregate processing	RMR40	UR	R-L	16.73	17.09	98%
Mill Creek Drainage	038-150-01	Single Family Residential	RR5	RR	R-S	0.81	0.87	93%
Mill Creek Drainage	038-150-05	Single Family Residential	RR5	RR	R-S	2.79	2.82	99%
Mill Creek Drainage	038-150-08	Single Family Residential	RR5	RR	R-S	3.13	3.13	100%
Mill Creek Drainage	038-150-12	Single Family Residential	RR5	RR	R-S	1.03	1.04	99%
Mill Creek Drainage	038-150-13	Single Family Residential	RR5	RR	R-S	1.64	1.64	100%
Mill Creek Drainage	038-150-15	Single Family Residential	RR5	RR	R-S	1.05	1.08	98%
Mill Creek Drainage	038-150-19	Single Family Residential	RR5	RR	R-S	1.81	1.89	96%
Mill Creek Drainage	038-150-20	Single Family Residential	RR5	RR	R-S	2.36	2.61	91%
Mill Creek Drainage	038-150-22	Single Family Residential	RR5	RR	R-S	0.06	4.44	1%
Mill Creek Drainage	038-150-23	Single Family Residential	RR5	RR	R-S	7.44	7.60	98%
Mill Creek Drainage	038-150-24	Single Family Residential	RR5	RR	R-S	0.35	0.37	96%
Mill Creek Drainage	038-150-31	Vacant Residential, wooded hillslope	RR5	RR	R-S	0.32	39.63	1%
Cropley Lane	038-130-37	Cemetery	PF	PF	M-G	0.22	0.22	100%
Cropley Lane	038-130-46	Vacant Industrial Land, wooded hillslope	I	I2	M-G	0.65	3.73	17%
Cropley Lane	038-130-49	Warehousing	I	I2	M-G	7.75	10.39	75%
Cropley Lane	038-130-90	Warehousing	I	I2	M-G	7.72	8.55	90%
Cropley Lane	038-130-92	Mineral Extraction, open brushy land	I	I2	M-G	13.68	18.79	73%
Cropley Lane	038-130-97	Misc structures and hoop houses, wooded hillslope	(blank)	(blank)	M-G	0.21	29.04	1%

Proposed SOI Area Name	APN	Use Description	Mendocino County		Proposed Willits General Plan	Prime Acres	Total Acres	% Prime
			General Plan	Zone				
Cropley Lane	038-130-98	Industrial yard area, wooded hillslope	(blank)	(blank)	M-G	14.82	20.34	73%

The table above lists information about each parcel that contains prime agricultural soils. The following bullets summarize the information by Proposed SOI:

- **Muir Mill Road**- This Proposed SOI Area is entirely underlain by prime agricultural soils if irrigated. This area is fully developed and planned and zoned by Mendocino County for multi-family residential development. The City of Willits proposes to maintain a similar land use designation of Residential-Medium Density. The prime soils in this area are entirely urbanized, so there would be no conversion of prime farmland.
- **East Valley Street Area-** This Proposed SOI Area is entirely underlain by prime agricultural soils if irrigated. A portion of this area is planned and zoned for agricultural use and the remainder is planned and zoned for multiple family development Parcels within this area average approximately 1.5 acres in size, with the largest parcel is slightly more than four acres. The City of Willits proposes to maintain the current Residential-Medium Density land use designation for the five parcels that together total about 4.8 acres. The City of Willits plans to apply an Industrial-General land use designation to a 8.6 acre area containing four parcels developed with industrial related uses; and apply an Agricultural-General land use designation to several parcels totaling 8.4 acres that developed with single family residences. In addition to a residence, two of the parcels proposed to be planned Agricultural-General are owned in common and contains a shared pasture that appears to be used for the keeping of horses, an arena, and areas for horse trailer parking. Grass grown on those parcels may be cut for on-site horse feed or fodder. Approximately three-quarters of a four acre parcel is prime farmland and planned and zoned for agricultural use (AG, 40 acre minimum). This parcel contains a home and has equestrian related improvements which appears to be used as a horse pasture. As such, the application of the Agricultural-Genera Land Use Designation would not convert Prime Farmland to non-agricultural use.
- **Locust Street Area-** There are approximately 126.6 acres of agricultural soils in this proposed SOI which are classified as prime if irrigated and prime if irrigated and drained. Most properties within this area are developed, including the Sherwood Valley Rancheria and casino to the northwest, smaller parcels containing manufactured homes and single-family residences to the northeast, and large-lot rural residential parcels in the lower three-quarters. Agriculture activity within this area appears to include hay production, likely for on-site use, and horse or cattle grazing. The City of Willits intends to plan the developed areas containing single family residences and manufactured homes Residential-Low Density, plan the underdeveloped areas which contains residences and limited agricultural uses for Residential-Medium Density uses, the remaining areas containing suburban or large lot residential as Residential-Suburban, and an area containing light industrial uses Industrial-General. Agriculture is not an intended or allowable use in the Residential-Medium Density Land Use Designation and could result in the conversion Prime Farmland to non-agricultural use.
- **West SR 20-** This area contains over 48 acres of soils that are mapped as prime if irrigated and prime if irrigated and drained which are located on the historic floodplain on the north side of Broaddus Creek. This area is planned Remote Residential and Industrial and zoned Upland

Residential and Limited Industrial. Developed parcels contain rural residences, an industrial park, and an RV campground. Several undeveloped parcels appear to have been used for cattle grazing, however, a significant portion of grazed area appears to have recently been filled with other material. The City of Willits intends to plan the developed areas containing single family residences and manufactured homes Residential-Low Density, plan the underdeveloped areas which contain some types of agricultural uses for Residential-Medium Density uses, the remaining areas containing suburban or large lot residential as Residential-Suburban, and an area containing light industrial uses Industrial-General. Agriculture is not the intended use but is an allowable use in the Residential-Low Density Land Use Designation and a conditionally permitted use in consistent zones. As such, the application of the Residential-Low Density Land Use Desingation would not convert Prime Farmland to non-agricultural use.

- **Mill Creek Drainage**- There is approximately 23.1 acres of prime agricultural soils if irrigated within the Mill Creek Drainage Proposed SOI area. The area containing such soils is located on either side of Mill Creek, planned and zoned for rural residential development, and nearly all parcels containing such soils are developed. The City of Willits is proposing to plan this area Residential-Suburban. Prime soils in this area mostly consist of riparian area behind single family residences on parcels that average approximately 2.5 acres in size. One parcel is approximately 7.6 acres and extends across Mill Creek and appears to have pasture area for horses or cattle. Agriculture is not the primary use but is an allowable use in the Residential-Suburban Land Use Designation and a permitted use in consistent zones. As such, the application of the Residential-Low Density Land Use Desingation would not convert Prime Farmland to non-agricultural use.
- **Cropley Lane Industrial-** There is approximately 50 acres of prime agricultural soils if irrigated and prime if irrigated and drained within the Cropley Lane Industrial Proposed SOI area. This area is planned and zoned for industrial use and contains what appear to be aggregate related industrial uses and also contains greenhouses in areas with prime soils and on upper slopes away from prime soils. Some portions of the parcel may periodically be grazed by cattle and greenhouses appear to be present based on aerial imagery. This City of Willits proposes to continue to plan this area for industrial uses. Agriculture is not the intended use but is an allowable use in the Industrial-General Land Use Designation and a permitted use in consistent zones. As such, the application of the Industrial-General Land Use Designation would not convert Prime Farmland to non-agricultural use.

As described above, prime farmland if irrigated as identified by the Natural Resource Conservation Service is present within the proposed SOI areas and some of these areas have limited agricultural activities, including cattle and horse grazing and hay production, and a very small portion is planned and zoned for agricultural uses. The proposed Project would apply land use designation that would allow more intensive residential uses and as a result, the Project could result in the conversion of prime agricultural soils to a non-agricultural use.

The current agricultural activities in the Central SOI, Southern Estates SOI take place on land planned and zoned Residential Suburban (R-S) by the County. Under their new land use designations, agricultural activities are still permitted and would be allowed to continue. Under the County's R-S zoning, any undeveloped property is allowed to be developed now, although the level of development depends upon the available services. For current agricultural activities in the East Valley SOI, the proposed Land Use Designation would be Agricultural-General.

In the proposed West State Route 20 SOI, animal grazing occurs in areas designated as Rural Residential (RR) or Upland Residential (U-R) by the County. The proposed Southern Estates SOI is

anticipated to maintain a similar residential suburban land use designation and zoning under the City's General Plan and Zoning Regulations. Under the proposed City R-S zoning, property may be allowed to develop at a maximum density of two units per acre.

Some portions of the proposed Cropley Lane SOI may periodically be grazed by cattle, however the Assessor does not identify these parcels with an agricultural-related use code. Mendocino County has planned and zoned this area Industrial, and the City of Willits proposes to plan this area for industrial uses. Agriculture is not the intended use but is an allowable use in the Industrial-General Land Use Designation, and under proposed policy LU-6.4 it is an encouraged interim use of industrial land.

The Project proposes to expand the City's SOI to include the land described above, some of which may contain agricultural activities and may qualify as prime agricultural land. Policy LU-2.2, Infill Development and LU-2.4, Annexations, encourages incremental development of infill sites and directs the City to monitor the supply of land and encourage annexations of land adjacent to the City that support the preservation of open space lands, promote orderly development in a manner consistent with the General Plan, and that create a logical City boundary. The General Plan prioritizes infill development prior to expanding the footprint of the City, encourages agricultural activities on large vacant parcels until such time as the lands are utilized for their intended purposes. Proposed Policy LU-2.4, Annexations, promotes orderly development to meet projected population growth that supports the preservation of open space lands. The proposed Land Use Element also includes Policy LU-8.5, where the City would discourage urban development on unincorporated land within its Sphere of Influence until annexed by the City.

Given that there are likely agricultural activities within portions of the proposed SOI and prime agricultural soils, there is the potential that any future annexation of such lands and development consistent with the proposed Land Use Element could result in the conversion of prime agricultural land, as defined by LAFCo, to a non-agricultural use. Any future annexation proposal would be required to undergo CEQA review, be consistent with Mendocino LAFCo policies regarding the protection of prime agricultural land and open space land, and if an annexation were to propose to convert agricultural uses to non-agricultural uses, such as proposal would be required to mitigate for such conversions prior to approval. The Land Use Element Update contains Policy LU-2.4 that is intended to preserve open space land as part of annexation. However, this policy may not be adequate to ensure that the potential for the conversion of Farmland to a non-agricultural use is less than significant. By including Mitigation Measure AG-01, the annexation planning process would be expanded to protect agricultural operations on prime agricultural soils. Through the implementation of this mitigation measure, potential impacts from the conversion of prime agricultural soils would be less than significant.

Mitigation Measure

AG-01: Proposed New Policy: Annexation Planning

Significance After Mitigation

Impacts would be less than significant after mitigation.

Bibliography

California Department of Conservation. (2022). *California Important Farmland Finder*. Retrieved from CA Gov: https://maps.conservation.ca.gov/DLRP/CIFF/

LACO. (2020). *Little Lake Valley Groundwater Managment Plan.*

3.3 AIR QUALITY

This section summarizes the existing air quality conditions of the region, agencies and regulations related to air quality in the region and analyzes potential impacts that may directly or indirectly result from the proposed Project.

ENVIRONMENTAL SETTING

North Coast Air Basin and Mendocino County Air Quality Management District

The Planning Area is located within the southern portion of the North Coast Air Basin (NCAB), which covers northwestern California. The NCAB consists of three (3) air districts: the North Coast Unified Air Quality Management District (NCUAQMD), the Mendocino County Air Quality Management District (MCAQMD), and the Northern Sonoma County Air Pollution Control District (NSCAPCD). The Planning Area is located within the jurisdiction of the MCAQMD (MCAQMD 2005).

Criteria Air Pollutants

The United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have set thresholds, referred to as National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for six (6) criteria pollutants, which include: ozone (O_3), carbon monoxide (CO), nitrogen oxides (NO_x), lead (Pb), sulfur dioxide (SO_2), particulate matter less than 10 microns in size (PM_{10}), and particulate matter less than 2.5 microns in size ($PM_{2.5}$). The standards set by the CARB are generally more stringent than those set by the EPA, and the CARB has set additional standards for visibility-reducing particles (of any size), sulfates, and hydrogen sulfide (H_2S). These standards are based on observable short-term (acute) health effects (MCAQMD 2005).

A description of the six (6) criteria pollutants is provided below. These descriptions are generally based off EPA definitions (EPA 2023).

O_3: O_3 is a gas that occurs both in the Earth's upper atmosphere and at ground level. Ground-level O_3 is a harmful air pollutant. Ground-level O_3 is not emitted directly into the air but is created by chemical reactions between NO_x and volatile organic compounds (VOC), which happens when pollutants emitted by cars, power plants, industrial boilers, refineries, chemical plants, and other sources chemically react in the presence of sunlight. Ground-level O_3 can make it difficult to breathe, inflame and damage the airways, make lungs more susceptible to infections, and aggravate lung diseases.

CO: CO is a colorless, odorless gas that is released when something is burned. The greatest source of CO is motor vehicles. CO can be harmful when inhaled in large amounts and can cause dizziness, confusion, unconsciousness, and death. High levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with certain types of heart disease.

NO_x: NO_x is a group of highly reactive gases. Nitrogen dioxide (NO_2) is one of the groups of NO_x and is used as an indicator of the larger group of NO_x. NO_2 emissions are primarily from the burning of fuel, including emissions from vehicles, power plants, and off-road equipment. Short-term exposure to NO_2 can aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Long term exposure may contribute to the development of asthma and potentially increase susceptibility to respiratory infections.

Pb: Sources of lead emissions vary from one area to another, but generally occur from ore and metals processing, piston-engine aircraft operating on leaded aviation fuel, waste incinerators, utilities, lead-acid battery manufacturers, and lead smelters. The EPA's regulatory efforts, including the removal of lead from gasoline, have significantly decreased levels of lead in the air. Exposure to lead emissions can impact the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system.

SO_2: SO_2 is one of a group of gases referred to as sulfur oxides (SO_x). The largest source of SO_2 is the burning of fossil fuels by power plants and other industrial facilities. Short-term exposure to SO_2 can harm the human respiratory system, making it difficult to breathe, and particularly impact people with asthma.

$PM_{2.5}$ and PM_{10}: $PM_{2.5}$ and PM_{10} are a mixture of solid particles and liquid droplets found in the air, some of which are large enough to be seen with the naked eye, such as dust, dirt, soot, or smoke, and some of which are so small they can only be detected with an electron microscope. Some are emitted directly from a source, such as construction sites, unpaved roads, fields smokestacks, or fires, and others form in the atmosphere as a result of complex reactions of chemicals such as SO_2 and NO_x. $PM_{2.5}$ and PM_{10} can get deep into lungs, potentially reaching the bloodstream, and can affect the heart as well. They are also the main cause of reduced visibility, referred to as haze, in parts of the United States.

Ambient Air Quality and Attainment Status

Air districts in California are required to monitor air pollutant levels to assure that NAAQS and CAAQS are met and, in the event that they are not, to develop strategies to meet these standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." The MCAQMD has been determined to be in "attainment", or within allowable limits, for NAAQS, and CAAQS except for the state PM_{10} standard. The main concern of PM_{10} emission sources in the MCAQMD are wildfires, residential wood burning, unpaved roads, and construction activities (MCAQMD 2005).

Local Air Quality Conditions

The Ukiah E. Gobbi Street Monitoring Station, located approximately 18 miles southeast of the Planning Area, was used for O_3 air quality data. The Fort Bragg – 300 Dana Street Monitoring Station, located approximately 22 miles west of the Planning Area, was used for PM_{10} air quality data. The Willits – Blosser Lane Monitoring Station, located within the Planning Area, was used for $PM_{2.5}$ air quality data. Table 3.3a summarizes the number of days air quality exceeded NAAQS and CAAQS annually for the respective criteria pollutants for the Planning Area over the years 2019 through 2021 at the various monitoring stations.

Table 3.3a Annual Exceedances of NAAQS and CAAQS

Pollutant	2019	2020	2021
O_3, Maximum 1-Hour			
Number of Federal Exceedances (days)	0	0	0
Number of State Exceedances (days)	0	0	0
O_3, 8-Hour Average			

Pollutant	2019	2020	2021
Number of Federal Exceedances (days)	0	0	0
PM_{10}			
Number of Federal Exceedances (days)	0	2.1	0
Number of State Exceedances (days)	0	6.4	1
$PM_{2.5}$			
Number of Federal Exceedances (days)	0	0	6

Source: CARB 2023.

Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare, including protection of those most susceptible to air pollution. Sensitive receptors are defined as people that have an increased sensitivity to air pollution or environmental contaminants. Therefore, sensitive receptor locations generally include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling unit(s).

REGULATORY SETTING

FEDERAL

Federal Clean Air Act

The Clean Air Act (CAA) is a federal law that regulates sources of air emissions in the United States. The CAA is enforced by the EPA and authorizes the EPA to establish NAAQS that states must make efforts to meet in order to protect public health and public welfare. The EPA also oversees state and local actions and implements programs for toxic air pollutants, heavy duty trucks, locomotives, ships, aircraft, off-road diesel equipment, and other types of industrial equipment.

STATE

California Clean Air Act

The CARB is responsible for air pollution control in California, including administering the California Clean Air Act (CCAA). CARB has established CAAQS that are equally to or more stringent than NAAQS. The CARB also implements programs to improve air quality and delegates the responsibility of regulating stationary emission sources to local air agencies.

REGIONAL AND LOCAL

Mendocino County Air Quality Management District – Particulate Matter Attainment Plan

The MCAQMD is the agency responsible for enforcement of state and federal air quality laws and local air quality regulations in Mendocino County. The MCAQMD is in “attainment”, or within allowable limits, for NAAQS, and CAAQS except for the state PM_{10} standard. The CCAA does not require attainment plans or transportation conformity for districts that exceed the PM_{10} standard, but only requires that districts make reasonable efforts toward coming into attainment, which is defined as a 5-percent reduction in emissions per year until the standard is attained. However, the MCAQMD adopted a Particulate Matter

Attainment Plan (Attainment Plan), dated January 2005, that includes a description of local air quality, the sources of local particulate matter emissions, and recommended control measures to reduce future particulate matter levels (MCAQMD 2005).

Mendocino County Qir Quality Management District – Rules and Regulations

Air districts in California must develop regulations based on the measures identified in the CAA as well as state regulations. New rules are developed, and existing rules are amended to ensure reduced emissions in compliance with these federal and state regulations as well as protect and improve public health and air quality. The MCAQMD has developed a set of rules and regulations in compliance with federal and state regulations. The MCAQMD's current rules and regulations were most recently updated in 2011 (MCAQMD 2011).

Vision 2020, Willits General Plan Revision (1992)

The Willits General Plan, Section 3.200, Conservation and Open Space Policies, contains City policies relating to air quality, which includes Policy 3.210, which directs the City to conserve, to the greatest feasible extent, air quality; 3.280, which directs the City to support local and regional air quality policies; and 3.290, which promotes alternatives to the automobile to improve air quality. The environmental impact report for the Willits General Plan contains mitigation measure 4.330, which is intended to reduce potential air quality impacts, and is applicable as policy within the City, and further encourages reductions in automobile use and requires mitigation when air quality standards would be exceeded by projects.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS

Consistent with Appendix G of the CEQA Guidelines, the proposed Project would have a significant impact on the environment associated with air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region in in non-attainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations; and/or
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Federal and State Thresholds

The EPA and CARB have established NAAQS and CAAQS for criteria pollutants in order to protect public health and public welfare. The NAAQS and CAAQS are provided in Table 3.3b, below.

Table 3.3.b NAAQS and CAAQS

Pollutant	Averaging Time	National A,C	State of California B,C
Ozone (O_3)	1 hour	NA	0.09 ppm (180 μg/m^3)
	8 hour	0.07 ppm (137 μg/m^3)	0.07 ppm (137 μg/m^3)
Carbon Monoxide (CO)	1 hour	35 ppm (40,000 μg/m^3)	20 ppm (23,000 μg/m^3)
	8 hour	9 ppm (10,000 μg/m^3)	9.0 ppm (10,000 μg/ m^3)

Pollutant	Averaging Time	National A,C	State of California B,C
Nitrogen Dioxide (NO_2)	1 hour	0.100 ppm (188 μg/m^3)	0.18 ppm (339 μg/m^3)
	Annual	0.053 ppm (100 μg/m^3)	0.03 ppm (57 μg/m^3)
Sulfur Dioxide (SO_2)	1 hour	0.075 ppm (196 μg/m^3)	0.25 ppm (655 μg/m^3)
	24 hour	0.14 ppm	0.04 ppm (105 μg/m^3)
	Annual	0.03 ppm	NA
Particulate Matter (PM_{10})	24 hour	150 μg/m^3	50 μg/m^3
	Annual	NA	20 μg/m^3
Particulate Matter ($PM_{2.5}$)	24 hour	35 μg/m^3	NA
	Annual	12 μg/m^3	12 μg/m^3
Sulfates	24 hour	NA	25 μg/m^3
Lead (Pb)	30 day	NA	1.5 μg/m^3
	Calendar Quarter	0.15 μg/m^3	NA
Hydrogen Sulfide (H_2S)	1 hour	NA	0.03 ppm (42 μg/m^3)
Vinyl Chloride	24 hour	NA	0.010 ppm (26 μg/m^3)

Notes:

A. National standards (other than O_3 particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8 hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24 hour standard is attained when the expected number of days per calendar year with a 24 hour average concentration above 150 μg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

B. California standards for O_3, CO (except 8-hour Lake Tahoe), SO_2 (1 and 24 hour), NO_2, and PM_{10}, $PM_{2.5}$, and visibility reducing particles are values that are not to be exceeded. Other California standards are not to be equaled or exceeded.

C. ppm = parts per million by volume; μg/m^3 = micrograms per cubic meter.

NA = Not Applicable.

Source: CARB 2016.

Mendocino County Air Quality Management District Thresholds

Additionally, the MCAQMD has identified significance thresholds for use in evaluating project impacts under CEQA, provided in Table 3.3c, below.

Table 3.3c MCAQMD Significance Thresholds

Pollutant	Construction Related	Operational Related	
Criteria Pollutants and Precursors (Regional)	**Average Daily Emission (lbs/day)**	**Indirect Average Daily**	**Stationary Maximum**

Pollutant	Construction Related	Operational Related	
		Emissions (lbs/day)	Annual Emissions (tpy)
ROG	54	180	40
NO_x	54	42	40
PM_{10}	82	82	15
$PM_{2.5}$	54	54	10
Fugitive Dust $PM_{10}/PM_{2.5}$	Best Management Practices	Same as Above	
Local CO	None	125 tpy	
Notes: • lbs = Pounds • tpy = Tons Per Year			

Source: MCAQMD 2010

METHODOLOGY

The proposed Project was qualitatively analyzed to address consistency with current air quality plans and standards. Therefore, the qualitative analysis discusses the proposed Project's consistency with the MCAQMD's PM_{10} Attainment Plan (2005) and rules and regulations (2011).

PROJECT IMPACTS AND MITIGATION

Impact AQ-01: The proposed Project would be consistent with MCAQMD's Particulate Matter Attainment Plan and rules and regulations. Impacts would be less than significant.

CEQA requires lead agencies to determine whether a project is consistent with applicable air plans. The MCAQMD Attainment Plan (2005) recommends control measures to reduce future particulate matter levels. The Attainment Plan does not provide criteria pollutant thresholds for general plan updates, such as the proposed Project. As such, there is no programmatic threshold of significance established for criteria pollutants for which to compare the proposed Project. Instead, the policies of the proposed Project will be compared to the Attainment Plan for consistency. The Attainment Plan contains control measures to help reduce particulate matter, including measures regarding woodstoves, campgrounds, unpaved roads, construction and grading activities, new residential development, and open burning emission reduction control measures. Additionally, Appendix B of the Attainment Plan acknowledges that although vehicles are a significant source of particulate matter, emission levels for motor vehicles are under the authority of the CARB, and therefore, the MCAQMD can only recommend more stringent standards. The following policies are part of the proposed Project, which are either modified policies from the Vision 2020 Willits General Plan Revision (General Plan) adopted in 1992 or new policies, and would be consistent with the Attainment Plan (2005) and help to reduce PM_{10} emissions:

- **LU-2.4 Annexations:** Monitor the supply of land within the City that is planned for residential, commercial, industrial, and public service uses and, as appropriate, encourage annexations of land adjacent to the City that support the preservation of open space lands, promote orderly development in a manner consistent with the General Plan and contribute to the City's fiscal

stability, and that create a logical City boundary; result in the efficient use of City services and utilities; and support a transportation network that, in combination with an appropriate mix of land uses, minimizes vehicle trips by promoting walking, bicycling, and transit. *(Source: Existing Policy 1.240, modified)*

- **LU-3.1 Complete Streets:** Consistent with Circulation Element Policies 2.230 and 2.260 that seek to enhance the street network for walking and biking and reduce single occupancy vehicle trips, the design, construction, reconstruction, repair and maintenance efforts on the City's streets, bridges, pathways, and sidewalks, shall create a comprehensive, integrated transportation network that is safe, accessible, comfortable Complete streets accommodate and welcome users of all ages, races, ethnicities, incomes, and physical abilities, and all modes of transportation, particularly those walking, biking, and using transit, The City shall apply a Complete Streets framework in all applicable and feasible transportation projects to allow the safe, comfortable, convenient and accessible use of streets for all street users. *(Source: New Policy)*
- **LU-3.3 Mixed Use Areas:** Encourage development that creates vibrant and walkable areas, reduces greenhouse gas emissions, and promotes economic development within downtown and neighborhood areas by implementing mixed use land use designations that support a range of commercial, office and residential uses; enable the flexible use of existing structures and vacant land; and ensure compatibility with adjacent land uses, particularly residential uses, through site, landscape, and building design features *(Source: New Policy)*
- **LU-4.6 Slowing Traffic:** Continue to evaluate modifications to Main Street design to slow traffic and provide a comfortable atmosphere for outdoor seating and gathering, walking, and biking, while considering the needs for parking. *(Source: New Policy)*
- **LU-4.7 Main Street Shop Fronts:** Protect and enhance the commercial frontages along Main Street between Commercial Street and Oak Street and encourage mixed-uses where commercial uses are typically located along the sidewalk and create a comfortable environment for shopping, gathering, and walking. *(Source: New Policy).*
- **LU-5.4 South Main Street Improvements:** In cooperation with property owners and Caltrans, develop and implement street design standards, including lane configuration, coordinated landscaping, signage, street lighting, benches, wider sidewalks, safe crossings, and bike lanes, to enhance and beautify the streetscape and building frontages to support businesses and to provide a safer, and more enjoyable atmosphere for shopping, walking, biking, outdoor seating and gathering, consistent with any City Complete Streets policies. *(Source: New Policy).*

Although the proposed Project would not directly impact air quality, new development facilitated by the proposed Project may emit criteria pollutants. As the proposed Project would involve new residential and non-residential land use designations, the proposed Project would have the potential to indirectly conflict with the MCAQMD's Attainment Plan (2005) and rules and regulations (2011). However, new development would be required to comply with the MCAQMD's Attainment Plan (2005) and rules and regulations and would be required to obtain applicable permits from the MCAQMD. As such, a less than significant impact would occur.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Impact AQ-02: The proposed Project and development facilitated by the proposed Project would not result in a cumulatively considerable net increase of PM_{10}.

As discussed above, the MCAQMD has been determined to be in "attainment", or within allowable limits, for NAAQS, and CAAQS except for the state PM_{10} standard. Although the proposed Project would not directly result in construction or operation of new development, future development facilitated by the proposed Project would likely result in short term air pollutant construction emissions and long-term operational emissions. The MCAQMD has not developed plan-level significance thresholds; however, as shown above in Table 3.3b, the MCAQMD has identified project-specific significance thresholds for CEQA purposes.

Construction indirectly resulting from the proposed Project would have the potential to cause short term PM_{10} emissions, including from fugitive dust, combustion of fuel, and vehicle usage. At this time, it is not possible to know the exact type, number, location, or duration of future construction projects that may indirectly result from the proposed Project, and therefore, it is not possible to accurately assess the level of emissions that would be generated by future development within the Planning Area. However, construction of future development projects within the proposed SOI Expansion Areas and Land Use Change areas within the City would be required to comply with the MCAQMD's rules and regulations (2011) and Attainment Plan (2005). Additionally, construction of new development within the Planning Area would be required to comply with California Code of Regulations, Title 13, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (adopted 2005), which limits idling from both on-road and off-road diesel-powered equipment, and Rule-1-430 (Fugitive Dust Emissions) of Chapter IV (Prohibitions) of Regulation 1 (Air Pollution Control Rules) of the MCAQMD's rules and regulations (MCAQMD 2011), which requires the suppression of fugitive dust during construction and operation and maintaining construction equipment in good working order such that exhaust and fugitive dust emissions are minimized. As construction would be required to comply with the regulations discussed above, construction indirectly resulting from the proposed Project would not result in a cumulatively considerable net increase of $PM_{10.}$

The proposed Project would accommodate new residential and non-residential land uses. Growth associated with implementation of the proposed Project would result in long term emissions of criteria air pollutants, including $PM_{10.}$ As mentioned above, the main concern of PM_{10} emission sources in the MCAQMD are wildfires, residential wood burning, unpaved roads, and construction activities. Additionally, Appendix B of the Attainment Plan (2005) acknowledges that although vehicles are a significant source of particulate matter, emission levels for motor vehicles are under the authority of the CARB, and therefore, the MCAQMD can only recommend more stringent standards. Similar to indirect construction emissions, it is not possible to know the exact type, number, location, or duration of future operations that may indirectly result from the proposed Project, and therefore, it is not possible to accurately assess the level of emissions that would be generated by future operations within the Planning Area. However, future development would also be required to comply with the MCAQMD's rules and regulations (2011) and Attainment Plan (2005). Additionally, the proposed Project would include the above-mentioned policies, which would be consistent with reducing PM_{10} emissions.

As construction and operations that may indirectly result from the proposed Project would comply with relevant air quality regulations, including the MCAQMD's rules and regulations (2011) and Attainment Plan (2005), and as the proposed Project contains policies that would be consistent with reducing PM_{10}

emissions, the proposed Project would not result in a cumulatively considerable net increase of PM_{10}. A less than significant impact would occur.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Impact AQ-03: The proposed Project and construction and development activities facilitated by the proposed Project could expose sensitive receptors to substantial pollutant concentrations; however, impacts would be less than significant.

Although the proposed Project would not directly expose sensitive receptors to substantial pollutant concentrations, construction and development activities indirectly facilitated by the proposed Project may expose sensitive receptors. During construction of new development, nearby sensitive receptors may be exposed to pollutant concentrations from construction activities, such as fugitive dust and diesel-powered construction equipment. However, as mentioned above, construction of new development within the Planning Area would be required to comply with California Code of Regulations, Title 13, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (adopted 2005), which limits idling from both on-road and off-road diesel-powered equipment, and Rule-1-430 (Fugitive Dust Emissions) of Chapter IV (Prohibitions) of Regulation 1 (Air Pollution Control Rules) of the MCAQMD's rules and regulations (MCAQMD 2011), which requires suppression of fugitive dust during construction and operation and maintaining construction equipment in good working order such that exhaust and fugitive dust emissions are minimized. As such, construction activities would not expose sensitive receptors to substantial pollutant concentrations.

As the proposed Project would accommodate new residential and non-residential land uses, the proposed Project may potentially place residential units or other sensitive receptors near uses with incompatible pollutant concentrations, such as industrial uses, or vice versa. However, the following proposed Project contains various policies, which are either modified policies from the General Plan (1992) or new policies, which are geared towards ensuring new development and land uses are compatible with surrounding uses.

- **LU-3.3 Mixed Use Areas:** Encourage development that creates vibrant and walkable areas, reduces greenhouse gas emissions, and promotes economic development within downtown and neighborhood areas by implementing mixed use land use designations that support a range of commercial, office and residential uses; enable the flexible use of existing structures and vacant land; and ensure compatibility with adjacent land uses, particularly residential uses, through site, landscape, and building design features.
- **LU-6.1 Limit Incompatible and Conflicting Uses:** Minimize potential land use conflicts by applying appropriate land use designations and implementing appropriate development standards and buffers through modifications to the Zoning Regulations to limit adverse impacts from future development on surrounding properties. (*Source: Existing Policy 1.220, modified)*
- **LU-6.2 Compatible Development:** On lands designated for industrial or commercial uses, buildings and accessory structures should be sited and designed to limit potential conflicts with adjacent residential land uses. *(Source: Existing Policy 1.280, modified)*

- **Implementation LU-6A Zoning Regulations.** Update the Zoning Regulations to:
    - Add performance standards for industrial and heavy commercial development adjacent to residential areas to provide buffers, landscaping, and screening that minimize noise, light, glare, and other impacts;
    - Increase the range of allowable uses and the incorporation of performance standards to limit potential impacts; and
    - Update the standards for home-based businesses to increase the range of allowable home-based business types in residential zones where potential nuisances are addressed through the permit approval process.

The proposed Project's policies would ensure new development and land uses are compatible with surrounding uses, sensitive receptors would not be exposed to substantial pollutant concentrations. A less than significant impact would occur.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Impact AQ-04: The proposed Project and development activities facilitated by the proposed Project would not create objectionable odors that could adversely affect a substantial number of people.

Construction activities facilitated by the proposed Project may indirectly expose people to objectionable odors, including odors from fuel combustion, solvents and paints, and asphalt paving. However, odors such as these would be limited to during construction activities, would quickly disperse, and would be temporary. As such, a less than significant impact would occur from construction activities facilitated by the proposed Project.

Land uses typically associated with objectionable odors include agricultural uses, industrial facilities, and landfills. As the proposed Project would involve new agricultural and industrial land use designations, the proposed Project may indirectly introduce uses that create objectionable odors. However, the proposed Project's policies listed above, including LU-3.3, LU-6.1, LU-6.2, and Implementation LU-6A would ensure that new development and land uses are compatible with surrounding uses. As such, incompatible land uses creating objectionable odors would not be located to where they would adversely impact a substantial number of people.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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Acronyms/Abbreviations

Attainment Plan	Particulate Matter Attainment Plan
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CCAA	California Clean Air Act
CO	Carbon Monoxide
EPA	United States Environmental Protection Agency
H_2S	Hydrogen Sulfide
lbs	Pounds
MCAQMD	Mendocino County Air Quality Management District
NAAQS	National Ambient Air Quality Standards
NCAB	North Coast Air Basin

NCUAQMD	North Coast Unified Air Quality Management District
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NSCAPCD	Northern Sonoma County Air Pollution Control District
O_3	Ozone
PB	Lead
PM_{10}	Particulate Matter Less Than 10 Microns in Size
$PM_{2.5}$	Particulate Matter Less Than 2.5 Microns in Size
SO_2	Sulfur Dioxide
SO_x	Sulfur Oxide
Tpy	Tons Per Year
VOC	Volatile Organic Compounds

3.4 BIOLOGICAL RESOURCES

This section summarizes the biological resources and relevant regulatory context associated with the City of Willits Planning Area, and provides an evaluation of the potential impacts of the Project on such resources.

ENVIRONMENTAL SETTING

The City of Willits Planning Area is situated between 39.327–39.468º N latitude and 123.391–123.264º W longitude along the interface between the USDA-defined humid temperate Northern California Coast and Northern California Coast Ranges ecological sections (Cleland et al. 2007). Although the Planning Area most closely reflects characteristics associated with the latter ecological section, the muted maritime influence from the nearby Pacific Ocean (~23 miles) does result in some environmental conditions within the Planning Area that are intermediate between those described for both regions.

The Planning Area generally experiences a Mediterranean climate, typified by hot dry summers and cool wet winters. Average normal minimum and maximum temperatures recorded for the City of Willits range from 32º F in December to 84º F in July, respectively (NOAA 2023). Precipitation typically arrives to the region associated with coastal weather systems and patterns of deposition are strongly influenced by local topography. Average normal annual precipitation for the City of Willits is 49.23 inches (NOAA 2023), which falls mostly as rain during the months of October–April, though some snow occasionally falls within the Planning Area at higher elevations and/or during colder periods.

The surrounding mountainous landscape of the Northern California Coast Range predominantly consists of low- to moderate-elevation parallel ranges with steep slopes derived primarily from erosive Franciscan sedimentary and volcanic sources, though some metamorphic material of tectonic origin can also be found. Little Lake Valley, which occupies much of the Planning Area, offers a relatively uncommon regional exception. This graben-type valley has formed over time through a combination of settling associated with movement along the Maacama strike-slip fault, and the gradual accumulation of alluvial deposits transported to the valley floor from weathering and erosion of the surrounding hillslopes. The City of Willits' incorporated territory itself, and the proposed expanded Sphere of Influence, are situated on the western edge of Little Lake Valley and along the toe of the adjacent slope, with two disjunct incorporated islands of City-owned property located northwest of the City in Brooktrails (i.e., the 73-acre Ells Field/Willits Municipal Airport) and to the southeast of the City (i.e., the 34-acre Morris Reservoir/Willits Municipal Water Treatment Plant). Elevations across the Planning Area range from as low as ~1,300 feet at the northern end of Little Lake Valley to ~3,300 feet in the Laughlin Range at the southern extent of the Planning Area.

AQUATIC RESOURCES

The Planning Area also includes a significant portion of the middle–upper reaches of the Outlet Creek watershed, a primary tributary to the middle Mainstem Eel River (Figure 2-1). Numerous tributary streams drain the adjacent hillsides and variously merge within the Planning Area to form Outlet Creek, which flows to the northwest from Little Lake Valley before eventually emptying into the mainstem Eel River northeast of Longvale, ~12 miles north of the Planning Area. The most significant streams within the Planning Area that feed Outlet Creek flow through the incorporated City limits and proposed expanded Sphere of Influence and include Willits, Mill, Broaddus, Baechtel, and Haehl Creeks. Other significant tributary streams of Outlet Creek elsewhere within the Planning Area include Davis, Berry, and Upp Creeks. Davis Creek flows through and fills both Centennial Reservoir and the aforementioned Morris Reservoir (Figure 2-1).

Prior to 1910, the aforementioned streams historically contributed to a large seasonal lake at the north end of the Planning Area, from which, Little Lake Valley derived its name. Beginning in 1910, substantial diking, channelization, flow redirection, and other forms of hydrological modification were undertaken to connect the aforementioned streams to Outlet Creek and drain the seasonal lake in order to convert the former lakebed to grazing pasturage and cropland (LeDoux-Bloom and Downie 2007). Subsequent flooding events, particularly in 1955 and 1964, resulted in additional channelization and levee construction along portions of some of the aforementioned streams to reduce flood-related impacts within the incorporated City limits and the surrounding area and to further facilitate drainage within Little Lake Valley.

Currently, relict vestiges of the historically larger lake typically only form in the northern portion of Little Lake Valley during periods of elevated precipitation, though wetland habitats do occur throughout the valley, and to a lesser extent within the incorporated City limits, the proposed expanded Sphere of Influence, and elsewhere within the Planning Area (Figure 2-1). These wetland habitats are typically associated with a shallow water table and are subsidized through varying combinations of direct precipitation, groundwater seeps and springs, overbank flooding of adjacent streams, laminar flow and runoff during storm events, and/or agricultural irrigation and runoff. In addition to aforementioned naturally formed wetlands and related aquatic features, anthropogenic ponds and other impoundments also occur within the incorporated City limits, proposed expanded Sphere of Influence, and elsewhere within the Planning Area (Figure 2-1).

Many of the aforementioned aquatic resources within the Planning Area have been identified in the U.S. Fish and Wildlife Service's (USFWS) National Wetlands Inventory (NWI) (USFWS 2023a), though it is important to note that this dataset relies heavily upon automated procedures to interpret remote sensing data and aerial imagery, and the inherent error associated with such methodologies can result in the failure to detect, and/or inaccurate depiction of, actual *in situ* conditions. Aquatic resources within the NWI are classified according to the Federal Geographic Data Committee's (FGDC) updated *Classification of Wetlands and Deepwater Habitats of the United States, Second Edition* (FGDC 2013), which categorizes each feature as being a wetland or water of either the riverine, palustrine, or lacustrine aquatic systems, and further qualifies each feature according to associated vegetation, substrate, water regime, and/or water chemistry characteristics. Some aquatic features are qualified further still to indicate if a given aquatic feature in question was constructed, is artificially flooded, or is otherwise of anthropogenic origin. Brief descriptions of those aquatic systems known from within the Planning Area and their distribution therein, follow.

Riverine System

The riverine aquatic system includes all channelized freshwater wetlands and deepwater habitats with low ocean-derived salinity levels (< 0.5 ppt). The riverine system is bounded either by the channel banks or by other contiguous aquatic systems including different adjacent wetland types along riverine channel peripheries, lakes at the source or downstream terminus of a given stream system, or certain other in-stream ponds or impoundments. In braided channel systems, the boundaries extend to the "outer limits of the depression within which the braiding occurs" (FGDC 2013). Within the Planning Area, the riverine system includes the aforementioned streams and tributaries that comprise the Outlet Creek watershed (Figure 2-1).

Palustrine System

The palustrine system includes freshwater wetlands with low ocean-derived salinity levels (< 0.5 ppt) that are not channelized, and which are typically vegetated. Palustrine wetlands are bounded either by adjacent upland habitats or by other contiguous aquatic systems including adjacent riverine stream

channels, or more extensive (≥ 20 acres) or deeper (≥ 8.2 feet) lacustrine aquatic features. The latter two criteria help to distinguish palustrine wetlands from larger and deeper freshwater wetlands and waters of the lacustrine system (see below). Vegetated palustrine wetlands are classified according to the tallest dominant vegetation layer present therein.

Palustrine (Freshwater) Emergent Wetlands

Palustrine "emergent" wetlands are vegetated freshwater wetlands without a significant woody plant component, having ≥ 30% aerial cover of (typically perennial) persistent, erect, rooted, herbaceous wetland vegetation. Palustrine emergent wetlands are the most common wetland type within the Planning Area and are most abundant at the northern end of Little Lake Valley, though they also occur elsewhere within the incorporated City limits, the proposed expanded Sphere of Influence, and elsewhere within the Planning Area (Figure 2-1). Such wetlands are often (but not always) associated with riparian areas near stream channels or the peripheries of ponds and/or other impoundments within the Planning Area (Figure 2-1).

Palustrine (Freshwater) Scrub-Shrub Wetlands

Palustrine "scrub-shrub" wetlands are those palustrine wetlands with ≥ 30% areal cover of woody vegetation < 20-feet tall. Within the Planning Area, the National Wetland Inventory (USFWS 2023a) identifies palustrine scrub-shrub wetlands occurring along the peripheries of palustrine emergent wetlands in the northern portion of Little Lake Valley (Figure 2-1). Here and elsewhere within the Planning Area where such wetlands occur, they likely represent mid-successional habitats, developing from herbaceous-dominated emergent wetlands to forested wetlands, particularly in locations where ambient disturbance regimes are either moderate or lacking.

Palustrine (Freshwater) Forested Wetlands

Palustrine forested wetlands support ≥ 30% areal cover of trees ≥ 20 feet in height. Within the context of the Planning Area, forested palustrine wetlands are only indicated in the NWI (USFWS 2023a) along a portion of upper Mill Creek, just west of the incorporated City limits and just north of the proposed expanded Sphere of Influence (Figure 2-1). However, this wetland type likely also occurs elsewhere within the incorporated City limits, proposed expanded Sphere of Influence, and/or elsewhere within the Planning Area where tree heights of forested wetland habitats reach or exceed 20 feet.

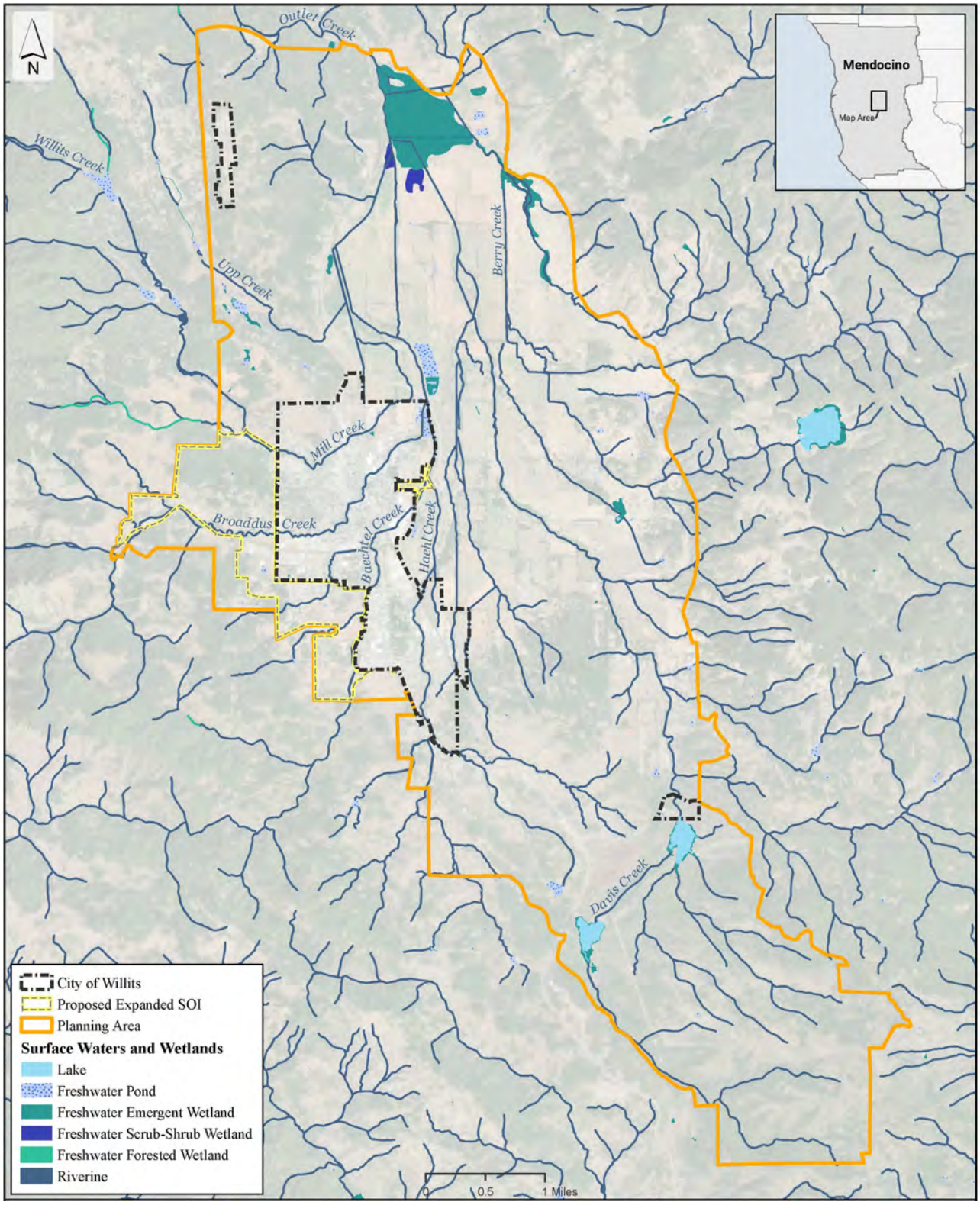
Unvegetated Palustrine Wetlands (Freshwater Ponds)

In instances where palustrine wetlands or waters are only sparsely vegetated (i.e., < 30% areal cover of vegetation), or lack vegetation entirely, they are typically shallow (< 8.2 feet deep) and < 20 acres in size. Within the Planning Area, such unvegetated palustrine wetlands (e.g., so-called "aquatic bed" or "unconsolidated bottom" wetland types) predominantly consist of shallow ponds or other similar impoundments (Figure 2-1).

Lacustrine System (Freshwater Lakes)

The lacustrine system includes freshwater (ocean-derived salinity levels < 0.5 ppt) lakes, reservoirs, and other deepwater habitats that also support < 30% areal cover of vegetation but have a total area ≥ 20 acres—or if < 20 acres—reach a depth of ≥ 8.2 feet. Lacustrine aquatic features within the Planning Area include Morris and Centennial Reservoirs (Figure 2-1), and potentially other deep ponds and/or impoundments therein.

Figure 3.4a Planning Area Aquatic Resources within the City of Willits Planning Area



VEGETATION

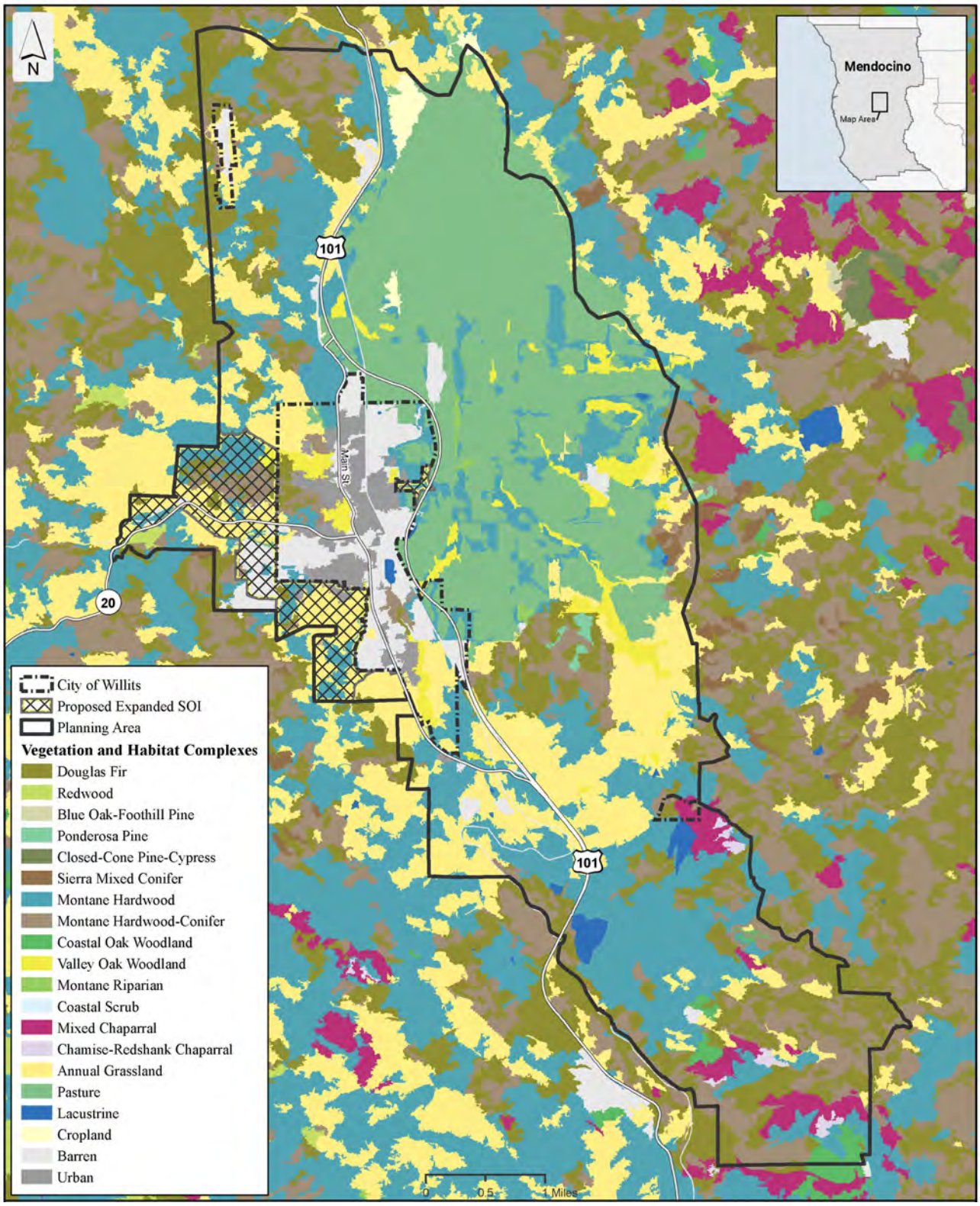
Given its transitional location between coastal and more inland ecological regions, the City of Willits Planning Area supports a correspondingly diverse assemblage of plant communities. General vegetation types therein include upland and riparian forests and woodlands; shrub-dominated chaparral; upland and wetland habitats dominated by grasses, forbs, and other herbaceous plants; as well as various intergrading mosaics of the aforementioned. Narrowly-defined, objective vegetation classifications at both the *alliance* and *association* levels (CNPS 2023a) allow for increased accuracy and precision when characterizing plant communities within various geographical contexts and they continue to be described, refined, and mapped throughout California. Fine-scale mapping of the Northern California Coast and Coast Range ecological sections is currently underway, but at present, no such vegetation descriptions or mapping data corresponding to the Planning Area have yet been published.

Below, we describe the vegetation associated with the City of Willits Planning Area more broadly, and where appropriate, refer to vegetation types or habitat complexes that have been established as part of the California Wildlife-Habitat Relationships (CWHR) system, which was developed to characterize such habitats at a scale sufficient to predict wildlife-habitat relationships (Mayer & Laudenslayer 1988). Elsewhere herein, where increased resolution is useful for the purposes of this analysis, the more precisely-defined *alliance* and/or *association* vegetation classification designations are also provided. Figure 3.4b (Vegetation and Habitat Complexes within the City of Willits Planning Area) depicts the distribution of such CWHR complexes within the vicinity of the Planning Area, as assigned within the U.S. Forest Service's CALVEG spatial dataset (USFS 2018). While informative, the rendering of the CALVEG dataset also relies upon automated procedures to interpret remote sensing data and aerial imagery, and the cumulative error inherent in such methodologies results in a relatively coarse degree of accuracy. Some variation between the CWHR habitat complexes depicted in Figure 2 and actual *in situ* conditions is to be expected and discrepancies are likely.

Upland Forests and Woodlands

The hillsides and slopes flanking the City of Willits and Little Lake Valley support forest and woodland vegetation communities composed of varying proportions of both conifers and hardwoods. Species assemblages, structural composition, and co-occurring understory characteristics vary depending on aspect, elevation, land use history, proximity to water, substrate type and other edaphic factors, but dominant and/or representative species include Douglas-fir (*Pseudotsuga menziesii*), ponderosa pine (*Pinus ponderosa*), incense cedar (*Calocedrus decurrens*), coast redwood (*Sequoia sempervirens*), Pacific madrone (*Arbutus menziesii*), California bay (*Umbellularia californica*), big-leaf maple (*Acer macrophyllum*), California buckeye (*Aesculus californica*), tan oak (*Notholithocarpus densiflorus* var. *densiflorus*), and other "true" oak species such as valley oak (*Quercus lobata*), Oregon white oak (*Q. garryana* var. *garryana*), California black oak (*Q. kelloggii*), canyon live oak (*Q. chrysolepis*), and interior live oak (*Q. wislizeni*). Representative CWHR vegetation complexes assigned to upland forests and woodlands within the Planning Area include "Douglas-Fir," "Ponderosa Pine," "Sierran Mixed Conifer," "Montane Hardwood-Conifer," "Redwood," "Montane Hardwood," "Coastal Oak Woodland," and "Valley Oak Woodland."

Figure 3.4b Vegetation and Habitat Complexes within the City of Willits Planning Area



Riparian Forests and Woodlands

Some of these woodland communities also extend along the slope toe and elsewhere throughout the Little Lake Valley floor, particularly along streams and their riparian corridors. Riparian forests and woodlands associated with streams and wetlands within the Planning Area often include valley oak (*Quercus lobata*) and some of the other aforementioned oak species (*Quercus* spp.), and are typically also associated with Oregon ash (*Fraxinus latifolia*), black cottonwood (*Populus trichocarpa*), occasionally Fremont cottonwood (*Populus fremontii*), white alder (*Alnus rhombifolia*), red willow (*Salix laevigata*), arroyo willow (*S. lasiolepis*), sandbar willow (*S. exigua* var. *hindsiana*), and potentially other willow species (*Salix* spp.) as well. Representative CWHR vegetation complexes assigned to riparian forests within the Planning Area include "Montane Riparian" and "Valley Oak Woodland."

Riparian Scrub

Riparian scrub communities and shrub-dominated riparian forest understories typically include species such as poison oak (*Toxicodendron diversilobum*), California rose (*Rosa californica*), coyote brush (*Baccharis pilularis*), blue elderberry (*Sambucus mexicana*), and the invasive Himalayan blackberry (*Rubus armeniacus*). If not represented as sub-dominant vegetative strata within riparian forests and woodlands, these communities typically occur as peripheral transitional habitats within the Planning Area, and as such, are not identified as being distinct from adjacent CWHR habitat complexes in Figure 2.

Chaparral

True chaparral habitat is largely limited to higher elevation ridgetops and similarly exposed rocky locations in the Laughlin Range and nearby locations in the southern portion of the Planning Area. Representative species from such locations include common manzanita (*Arctostaphylos manzanita* spp. *manzanita*), Eastwood manzanita (*A. glandulosa* ssp. *glandulosa*), Columbia manzanita (*A. columbiana*), white-leaf manzanita (*A. viscida* ssp. *pulchella*), chamise (*Adenostoma fasciculatum*), buckbrush (*Ceanothus cuneatus* var. *cuneatus*), California buckeye (*Aesculus californica*), birch-leaf mountain-mahogany (*Cercocarpus betuloides* var. *betuloides*), and scrub oak (*Quercus berberidifolia*). Representative CWHR vegetation complexes assigned to chaparral habitats within the Planning Area include "Mixed Chaparral" and "Chamise-Redshank."

Grasslands

Vegetated habitats within the Planning Area not dominated by forests, oak woodlands, or chaparral primarily consist of meadows and grasslands. Upland meadows and grasslands occur along the slopes around Little Lake Valley, and on well-drained soils at higher elevations on the valley floor. Many of these habitats have been extensively grazed by introduced livestock over the past 150–200 years and currently support an assemblage of primarily annual introduced grasses and/or other exotic forbs of Eurasian origin. In many cases plants known to have invasive characteristics are also common in such habitats such as yellow star-thistle (*Centaurea solstitialis*), ripgut brome (*Bromus diandrus*), cheat grass (*Bromus tectorum*), goat grass (*Aegilops triuncialis*), wild oat and slender wild oat (*Avena fatua* and *A. barbata*), rattlesnake grass (*Briza maxima*), Medusa head (*Elymus caput-medusae*), foxtail barley (*Hordeum murinum*), rattail sixweeks grass (*Festuca myuros*), tall fescue (*Festuca arundinacea*), Harding grass (*Phalaris aquatica*), rye grass (*Festuca perennis*), and others. Some grassland habitats in the Planning Area are irrigated and cultivated for hay production and/or pasturage for livestock. In such instances the plant species composition is typically dominated by non-native forage species and/or other non-native annual and perennial grass species.

Relict extant native grass species, where they occur in peripheral or isolated locations, include purple needlegrass (*Nassella pulchra*), California oat grass (*Danthonia californica*), blue wild-rye (*Elymus*

glaucus ssp. *glaucus*), bearded wild rye (*Elymus triticoides*), Columbia brome (*Bromus vulgaris*), and Idaho fescue (*Festuca idahoensis*). Narrow-leaf milkweed (*Asclepias fascicularis*) and showy milkweed (*Asclepias speciosa*) are two other native herbaceous plants associated with upland and mesic grassland habitats within the Planning Area. Representative CWHR vegetation complexes assigned to grassland habitats within the Planning Area include "Annual Grassland" and "Pasture.

Emergent wetlands

As described previously herein (see Aquatic Resources), herbaceous species-dominated wetland habitats such as marshes, wet meadows, springs, vernal pool-type habitats, and other mesic areas occur throughout the Planning Area, particularly on with less well-drained soils at lower elevations along the Little Lake Valley floor in the northern portion of the Planning Area. These habitats support varying assemblages of native and exotic, perennial and annual graminoids and other herbaceous forbs tolerant of prolonged periods of inundation and/or saturated soils. Representative plants include common tule (*Schoenoplectus acutus* var. *occidentalis*), cattails (*Typha* spp.), small-fruited bulrush (*Scirpus microcarpus*), sedges (*Carex* spp.), rushes (*Juncus* spp.), spikerush (*Eleocharis* spp.), camas lily (*Camassia* spp.), bearded wild rye (*Elymus triticoides*), and other hydrophytic species. Some emergent wetlands within the Planning Area that experience less extensive seasonal saturation are also cultivated with non-native forage grass species for hay production and/or are otherwise used as pasturage for livestock. The CWHR vegetation complexes assigned to emergent wetlands within the Planning Area appears to be predominantly "Pasture" or "Cropland."

Ponds

Where ponds and other seasonally- or perennially-flooded aquatic habitats with surface water throughout much of the year occur within the Planning Area, submerged and/or floating aquatic plants such as bur-reeds (*Sparganium* spp.), pondweeds (*Potamogeton* spp. and *Stuckenia* spp.), yellow pond-lily(*Nuphar polysepala*), water-milfoil (*Myriophyllum* spp.), mosquito fern (*Azolla filiculoides*), duckweed (*Lemna* spp.), duckmeat (*Spirodela* spp.), and watermeal (*Wolffia* spp.) can also be found. The CWHR complex assigned to ponds and other impoundments within the Planning Area is typically "Lacustrine," though this CWHR habitat complex designation is not to be confused with the Federal Geographic Data Committee's aquatic system classification of the same name, addressed previously herein (see Aquatic Resources).

Urban

Much of the landscape within the incorporated limits of the City of Willits, a portion of the proposed expanded Sphere of Influence, and to a lesser extent, elsewhere within the Planning Area, consists of developed urban areas, rural neighborhoods, and other unvegetated or sparsely vegetated ruderal sites associated with waysides, industrial properties, and/or otherwise disturbed or fallow areas. Some such locations are occasionally interspersed with remnant patches of the aforementioned native vegetation or landscaped vegetation planted for aesthetic purposes. Representative CWHR complexes assigned to urban and/or developed areas within the Planning Area include "Urban" and "Barren."

SPECIAL STATUS TAXA, FEDERALLY-DESIGNATED HABITATS, AND SENSITIVE NATURAL COMMUNITIES

The specific geographical context of the City of Willits Planning Area and the associated diversity of vegetative and aquatic resources therein provide suitable habitat for a correspondingly diverse assemblage of biological resources. Ninety-two (92) special status fish (5), wildlife (38), and botanical (49) taxa are known from, or have reasonable potential to occur within, the City of Willits Planning Area (Tables 3.4a and 3.4b) (BIOS 2023; Calflora 2023; CCH1 2023; CNDDB 2023; CNPS 2023b; eBird 2023; iNaturalist 2023; USFWS 2023b). Brief summaries of typical habitat associations, relevant life history

information, known threats, and available geographic occurrence information as it pertains to the Planning Area are provided for each in Appendix B.

Much of Outlet, Upp, Mill, Willits, Broaddus, Baechtel, Haehl, Davis, and Berry Creeks—including portions of their associated riparian habitats—within the incorporated City limits, the proposed expanded Sphere of Influence, and elsewhere within the Planning Area are federally-designated Critical Habitat for Coho Salmon (*Oncorhynchus kisutch*—Southern Oregon/Northern California ESU), Chinook Salmon

Table 3-4a. Special Status Fish and Wildlife Taxa Known From, or That Have Reasonable Potential to Occur Within, the City of Willits Planning Area. Within each category, taxa are listed in order of decreasing conservation priority.

	Conservation Listing Status and Rank				
Taxa	**FESA***	**CESA†**	**CDFW‡**	**GRank§**	**SRank§**
Mollusks					
Anodonta californiensis (California Floater)	None	None	None	G3Q	S2?
Insects					
Bombus occidentalis (Western Bumble Bee)	None	Candidate Endangered	None	G3	S1
Danaus plexippus plexippus (Western Monarch)	Candidate	None	None	G4T1T2Q	S2
Bombus caliginosus (Obscure Bumble Bee)	None	None	None	G2G3	S1S2
Fish					
Oncorhynchus mykiss irideus (Pop. 48) (Steelhead—Northern CA DPS, "Summer-Run")	Threatened	Endangered	None	G5T2Q	S2
Oncorhynchus kisutch (Pop. 2) (Coho Salmon—Southern OR/Northern CA ESU)	Threatened	Threatened	None	G5T2Q	S2
Oncorhynchus tshawytscha (Pop. 17) (Chinook Salmon—CA Coastal ESU)	Threatened	None	None	G5T2Q	S2
Oncorhynchus mykiss irideus (Pop. 49) (Steelhead—Northern CA DPS, "Winter-Run")	Threatened	None	None	G5T3Q	S3
Entosphenus tridentatus (Pacific Lamprey)	None	None	SSC	G4	S3
Amphibians					
Taricha rivularis (Red-bellied Newt)	None	None	SSC	G2	S2
Rana aurora (Northern Red-legged Frog)	None	None	SSC	G4	S3
Rana boylii (Foothill Yellow-legged Frog) (Pop. 1 — North Coast DPS)	None	None	SSC	G3T4	S4
Reptiles					
Emys marmorata (Northwestern Pond Turtle)	Proposed Threatened	None	SSC	G3G4	S3
Birds					
Coccyzus americanus occidentalis (Western Yellow-billed Cuckoo)	Threatened	Endangered	None	G5T2T3	S1
Haliaeetus leucocephalus (Bald Eagle)	Delisted	Endangered	FP	G5	S3
Strix occidentalis caurina (Northern Spotted Owl)	Threatened	Threatened	None	G3G4T3	S2
Empidonax traillii brewsteri (Willow Flycatcher)	None	Endangered	None	G5T3T4	S3
Falco peregrinus anatum (American Peregrine Falcon)	Delisted	Delisted	FP	G4T4	S3S4
Elanus leucurus (White-tailed Kite)	None	None	FP	G5	S3S4
Aquila chrysaetos (Golden Eagle)	None	None	FP	G5	S3
Chaetura vauxi (Vaux's Swift)	None	None	SSC	G5	S2S3
Accipiter atricapillus (American Goshawk)	None	None	SSC	G5	S3
Ammodramus savannarum (Grasshopper Sparrow)	None	None	SSC	G5	S3
Progne subis (Purple Martin)	None	None	SSC	G5	S3
Setophaga petechia (Yellow Warbler)	None	None	SSC	G5	S3
Icteria virens (Yellow-breasted Chat)	None	None	SSC	G5	S4
Pandion haliaetus (Osprey)	None	None	WL	G5	S4
Accipiter striatus (Sharp-shinned Hawk)	None	None	WL	G5	S4
Accipiter cooperi (Cooper's Hawk)	None	None	WL	G5	S4
Spinus lawrencei (Lawrence's Goldfinch)	None	None	None	G3G4	S4
Ardea herodias (Great Blue Heron)	None	None	None	G5	S4
Nycticorax nycticorax (Black-crowned Night Heron)	None	None	None	G5	S4
Mammals					
Martes caurina humboldtensis (Humboldt Marten)	Threatened	Endangered	SSC	G4G5T1	S1
Bassariscus astutus raptor (Northern California Ringtail)	None	None	FP	G5TNR	SNR
Corynorhinus townsendii (Townsend's Big-eared Bat)	None	None	SSC	G4	S2
Pekania pennanti (Fisher) (North. CA/South. OR DPS)	None	None	SSC	G5	S2S3
Arborimus pomo (Sonoma Tree Vole)	None	None	SSC	G3	S3
Antrozous pallidus (Pallid Bat)	None	None	SSC	G4	S3
Lasiurus frantzii (Western Red Bat)	None	None	SSC	G4	S3
Taxidea taxus (American Badger)	None	None	SSC	G5	S3
Eumops perotis californicus (Western Mastiff Bat)	None	None	SSC	G4G5T4	S3S4
Cervus canadensis nannodes (Tule Elk)	None	None	None	G5T3	S3
Lasionycteris noctivagans (Silver-haired Bat)	None	None	None	G3G4	S3S4

Table 3-4a. Special Status Fish and Wildlife Taxa Known From, or That Have Reasonable Potential to Occur Within, the City of Willits Planning Area. Within each category, taxa are listed in order of decreasing conservation priority.

	Conservation Listing Status and Rank				
Taxa	**FESA***	**CESA†**	**CDFW‡**	**GRank§**	**SRank§**

* Federal Endangered Species Act (1973 as amended)

† California Endangered Species Act (1970 as amended)

‡ Other California Department of Fish and Wildlife (CDFW) Special Status Designations (CDFW 2023b) (Appendix B, Table 1)

§ Global and State ("Heritage Method") Rarity Rank (NatureServe 2023) (Appendix B, Table 1)

Table 3.4b. Special Status Botanical Taxa Known From, or That Have Reasonable Potential to Occur Within, the City of Willits Planning Area. Within each botanical category, taxa are listed in order of decreasing conservation priority.

			Conservation Listing Status and Rank				
Taxa			**FESA***	**CESA†**	**CRPR‡**	**GRank§**	**SRank§**
Vascular Plants							
		Plagiobothrys lithocaryus (Mayacamas popcornflower)	None	None	1A	GX	SX
		Blennosperma bakeri (Sonoma sunshine)	Endangered	Endangered	1B.1	G1	S1
		Astragalus agnicidus (Humboldt County milk-vetch)	None	Endangered	1B.1	G2	S2
		Fritillaria roderickii (Roderick's fritillary)	None	Endangered	1B.1	G1Q	S1
		Lupinus milo-bakeri (Milo Baker's lupine)	None	Threatened	1B.1	G1Q	S1
		Pleuropogon hooverianus (North Coast semaphore grass)	None	Threatened	1B.1	G2	S2
		Limnanthes bakeri (Baker's meadowfoam)	None	Rare	1B.1	G1	S1
		Cryptantha excavata (deep-scarred Cryptantha)	None	None	1B.1	G1	S1
		Trifolium buckwestiorum (Santa Cruz clover)	None	None	1B.1	G2	S2
		Navarretia leucocephala ssp. *bakeri* (Baker's Navarretia)	None	None	1B.1	G4T2	S2
		Calystegia collina ssp. *tridactylosa* (three-fingered morning-glory)	None	None	1B.2	G4T1	S1
		Horkelia tenuiloba (thin-lobed Horkelia)	None	None	1B.2	G2	S2
		Silene bolanderi (Bolander's catchfly)	None	None	1B.2	G2	S2
		Tracyina rostrata (beaked Tracyina)	None	None	1B.2	G2	S2
		Trifolium hydrophilum (saline clover)	None	None	1B.2	G2	S2
		Hemizonia congesta ssp. *congesta* (congested-headed hayfield tarplant)	None	None	1B.2	G5T2	S2
		Gilia capitata ssp. *pacifica* (Pacific Gilia)	None	None	1B.2	G5T3	S2
		Hesperolinon adenophyllum (glandular western flax)	None	None	1B.2	G2G3	S2S3
		Cryptantha dissita (serpentine Cryptantha)	None	None	1B.2	G3	S3
		Piperia candida (white-flowered rein orchid)	None	None	1B.2	G3?	S3
		Arctostaphylos auriculata (Mt. Diablo manzanita)	None	None	1B.3	G2	S2
		Anisocarpus scabridus (scabrid alpine tarplant)	None	None	1B.3	G3	S3
		Silene hookeri (Hooker's catchfly)	None	None	2B.2	G4	S2
		Potamogeton epihydrus (Nuttall's ribbon-leaved pondweed)	None	None	2B.2	G5	S2S3
		Alisma gramineum (grass Alisma)	None	None	2B.2	G5	S3
		Brasenia schreberi (watershield)	None	None	2B.3	G5	S3
		Cypripedium montanum (mountain lady's-slipper)	None	None	4.2	G5	S3
		Lilium rubescens (redwood lily)	None	None	4.2	G3	S3
		Hosackia gracilis (harlequin lotus)	None	None	4.2	G3G4	S3
		Leptosiphon grandiflorus (large-flowered Leptosiphon)	None	None	4.2	G3G4	S3S4
		Perideridia gairdneri ssp. *gairdneri* (California Gairdner's yampah)	None	None	4.2	G5T3T4	S3S4
		Leptosiphon aureus (bristly Leptosiphon)	None	None	4.2	G4?	S4?
		Delphinium uliginosum (swamp larkspur)	None	None	4.2	G4G5	S4
		Pityopus californicus (California pinefoot)	None	None	4.2	G4G5	S4
		Erythronium citrinum var. *citrinum* (lemon-colored fawn lily)	None	None	4.3	G4T4	S3
		Pleuropogon californicus var. *davyi* (Davy's semaphore grass)	None	None	4.3	G5T3	S3
		Astragalus rattanii var. *rattanii* (Rattan's milk-vetch)	None	None	4.3	G4T4	S4
		Ceanothus gloriosus var. *exaltatus* (glory brush)	None	None	4.3	G4T4	S4
		Erythranthe nudata (bare monkeyflower)	None	None	4.3	G4	S4
		Fritillaria purdyi (Purdy's fritillary)	None	None	4.3	G4	S4
		Hemizonia congesta ssp. *calyculata* (Mendocino tarplant)	None	None	4.3	G5T4	S4
		Hemizonia congesta ssp. *tracyi* (Tracy's tarplant)	None	None	4.3	G5T4	S4
		Leptosiphon latisectus (broad-lobed Leptosiphon)	None	None	4.3	G4	S4
		Leptosiphon rattanii (Rattan's Leptosiphon)	None	None	4.3	G4	S4

Table 3.4b. Special Status Botanical Taxa Known From, or That Have Reasonable Potential to Occur Within, the City of Willits Planning Area. Within each botanical category, taxa are listed in order of decreasing conservation priority.

Taxa	Conservation Listing Status and Rank				
	FESA*	CESA†	CRPR‡	GRank§	SRank§
Wyethia longicaulis (Humboldt County Wyethia)	None	None	4.3	G4	S4
Nonvascular Botanical Species					
"Bryophytes" ("Mosses," "Liverworts," and "Hornworts")					
Bruchia bolanderi ("Bolander's Bruchia")	None	None	4.2	G3	S3
Lichens					
Ramalina thrausta ("angel's hair lichen")	None	None	2B.1	G5?	S2S3
Sulcaria badia ("grooved beard lichen")	None	None	4.2	G3	S3
Dolichousnea longissima (= *Usnea longissima*) ("Methuselah's beard lichen")	None	None	4.2	G4	S4

* Federal Endangered Species Act (1973 as amended)
† California Endangered Species Act (1970 as amended)
‡ California Native Plant Society's (CNPS) California Rare Plant Ranks (CNPS 2023b) (Appendix B, Table 2)
§ Global and State ("Heritage Method") Rarity Rank (NatureServe 2023) (Appendix B, Table 2)

Table 3.4c. Designated Critical Habitat and/or Essential Fish Habitat for Federally-Listed Taxa Known From, or That Have Reasonable Potential to Occur Within, the City of Willits Planning Area. Within each category, taxa are listed in order of decreasing conservation priority.

Taxa	Habitat Designation		Conservation Listing Status	
	Critical Habitat*	Essential Fish Habitat†	FESA‡	CESA§
Insects				
Danaus plexippus (Western Monarch)	Not within the Planning Area	N/A	Candidate	None
Fish				
Oncorhynchus mykiss irideus (Steelhead—Northern CA DPS)	Present	N/A	Threatened (Pops. 48 & 49)	Endangered (Pop. 48) None (Pop. 49)
Oncorhynchus kisutch (Coho Salmon—Southern OR/Northern CA ESU)	Present	Present	Threatened	Threatened
Oncorhynchus tshawytscha (Chinook Salmon—CA Coastal ESU)	Present	Present	Threatened	None
Reptiles				
Emys marmorata (Northwestern Pond Turtle)	None Yet Designated	N/A	Proposed Threatened	None
Birds				
Coccyzus americanus occidentalis (Western Yellow-billed Cuckoo)	Not within the Planning Area	N/A	Threatened	Endangered
Strix occidentalis caurina (Northern Spotted Owl)	Not within the Planning Area	N/A	Threatened	Threatened
Haliaeetus leucocephalus (Bald Eagle)	N/A	N/A	Delisted	Endangered
Falco peregrinus anatum (American Peregrine Falcon)	N/A	N/A	Delisted	Delisted
Mammals				
Martes caurina humboldtiensis (Humboldt Marten)	Not within the Planning Area	N/A	Threatened	Endangered

* Statutory authority: Federal Endangered Species Act (1973 as amended)
† Statutory authority: Magnuson-Stevens Fishery Conservation and Management Act (1976 as amended)
‡ Federal Endangered Species Act (1973 as amended)
§ California Endangered Species Act (1970 as amended)

(*Oncorhynchus tshawytscha*—California Coastal ESU), and "winter-run" Steelhead (*Oncorhynchus mykiss irideus*—Northern California DPS) (Table 3.4c). Although there is considerable overlap, the extent

of the Critical Habitat designation for each species varies both within and between each of the aforementioned watersheds, all of which are also federally-designated as Essential Fish Habitat for both Coho and Chinook Salmon as well (Table 3.4c).

Finally, thirty-nine (39) Sensitive Natural Communities recognized by the California Department of Fish and Wildlife as warranting California Environmental Quality Act (CEQA) consideration also have reasonable potential to occur within the Planning Area (Table 3.4d) (CNPS 2023a), some of which (i.e., *Quercus lobata* Woodland Alliance [Valley Oak Woodland and Forest] and *Quercus lobata* Riparian Forest and Woodland Alliance [Valley Oak Riparian Forest and Woodland]) have been documented in the California Natural Diversity Database (CNDDB) as being present therein (CNDDB 2023).

Table 3.4d California Sensitive Natural Communities Known From, or That Have Reasonable Potential to Occur Within, the City of Willits Planning Area. Within each category, communities are listed in order of decreasing conservation priority.

			Conservation Rank*	
Sensitive Natural Communities			**GRank**	**SRank**
Herbaceous Communities				
		Lasthenia glaberrima - *Eleocharis macrostachya* Herbaceous Alliance (Smooth goldfields - pale spike rush vernal pool bottoms)	G2	S2
		Scirpus microcarpus (Small-fruited bulrush marsh)	G4	S2
		Ruppia (*cirrhosa*, *maritima*) Herbaceous Alliance (Ditch-grass or widgeon-grass mats)	G4?	S2
		Carex barbarae Herbaceous Alliance (White-root beds)	G2?	S2?
		Juncus (*oxymeris*, *xiphioides*) Provisional Herbaceous Alliance (Iris-leaf rush seeps)	G2?	S2?
		Allium spp. – *Streptanthus* spp. – *Hesperolinon* spp. Serpentinite Sparsely Vegetated Alliance (Onion – twistflower – dwarf-flax serpentinite rock outcrop)	G2G3	S2S3
		Bromus carinatus - *Elymus glaucus* Herbaceous Alliance (California brome - blue wildrye prairie)	G3	S3
		Carex nudata Herbaceous Alliance (Torrent sedge patches)	G3	S3
		Heterotheca (*oregona*, *sessiliflora*) (Golden aster patches Herbaceous Alliance)	G3	S3
		Leymus cinereus - *Leymus triticoides* Herbaceous Alliance (Ashy ryegrass - Creeping wildrye turfs)	G3	S3
		Selaginella (*bigelovii*, *wallacei*) Herbaceous Alliance (Bushy spike-moss mats)	G4	S3
		Sedum spathulifolium Provisional Herbaceous Alliance (Coast Range stonecrop draperies)	G4?	S3
		Festuca idahoensis - *Danthonia californica* Herbaceous Alliance (Idaho fescue - California oatgrass grassland)	GNR	S3
		Mimulus guttatus - *Cirsium* spp. - *Stachys* spp. Herbaceous Alliance (Common monkey flower - thistle - hedge-nettle seeps)	GNR	S3
		Isoetes (*bolanderi*, *echinospora*, *howellii*, *nuttallii*, *occidentalis*) Provisional Herbaceous Alliance (Quillwort beds)	G3	S3?
		Torreyochloa pallida Herbaceous Alliance (Floating mats of weak manna grass)	G3	S3?
		Trifolium variegatum Herbaceous Alliance (White-tip clover swales)	G3?	S3?
		Stuckenia (*pectinata*) - *Potamogeton* spp. Herbaceous Alliance (Pondweed mats)	G3G5	S3?
		Sparganium (*angustifolium*) Herbaceous Alliance (Mats of bur-reed leaves)	G4	S3?
		Nuphar lutea Provisional Herbaceous Alliance (Yellow pond-lily mats)	G5	S3?
		Nassella spp. - *Melica* spp. Herbaceous Alliance (Needle grass - Melic grass grassland)	G3G4	S3S4
		Juncus (*effusus*, *patens*) - *Carex* (*pansa*, *praegracilis*) Herbaceous Alliance (Soft and western rush - Sedge marshes)	G4?	S3S4
		Schoenoplectus (*acutus*, *californicus*) Herbaceous Alliance (Hardstem and California bulrush marshes)	GNR	S3S4
Shrubland Communities				
		Arctostaphylos (*bakeri*, *montana*) Shrubland Alliance (Baker's or Mt. Tamalpais manzanita chaparral)	G3	S3
		Arctostaphylos (*canescens*, *manzanita*, *stanfordiana*) Shrubland Alliance Hoary, common, and Stanford manzanita chaparral	G3	S3
		Vitis arizonica - *Vitis girdiana* Shrubland Alliance (Wild grape shrubland)	G3	S3
		Quercus wislizeni - *Quercus chrysolepis* Shrubland Alliance (Canyon live oak - Interior live oak chaparral)	G4	S3S4
Forest and Woodland Communities				
		Pseudotsuga menziesii - *Calocedrus decurrens* Forest & Woodland Alliance (Douglas fir - incense cedar forest and woodland)	G3	S3
		Aesculus californica Forest & Woodland Alliance (California buckeye groves)	G3	S3
		Quercus lobata Woodland Alliance (Valley oak woodland and forest)	G3	S3

		Quercus lobata Riparian Forest & Woodland Alliance (Valley oak riparian forest and woodland)	G3	S3
		Acer macrophyllum Forest & Woodland Alliance (Bigleaf maple forest and woodland)	G4	S3
		Calocedrus decurrens Forest & Woodland Alliance (Incense cedar forest and woodland)	G4	S3
		Quercus garryana Forest & Woodland Alliance (Oregon white oak woodland and forest)	G4	S3
		Salix gooddingii - Salix laevigata Forest & Woodland Alliance (Goodding's willow - red willow riparian woodland and forest)	G4	S3
		Umbellularia californica Forest & Woodland Alliance (California bay forest and woodland)	G4	S3
		Acer negundo Forest & Woodland Alliance (Box elder forest and woodland)	G5	S3
		Populus trichocarpa Forest & Woodland Alliance (Black cottonwood forest and woodland)	G5	S3
		Fraxinus latifolia Forest & Woodland Alliance (Oregon ash groves)	G4	S3.2
*Global and State ("Heritage Method") Rarity Rank (NatureServe 2023) (Appendix B, Table 2)				

REGULATORY SETTING

A combination of federal, state, regional, and local agencies have regulatory authority over proposed actions that may affect biological resources. A brief summary of relevant statutes, laws, regulations, policies, and measures applicable to the biological resources potentially affected by the Project follows.

FEDERAL

Federal Endangered Species Act (FESA)

Threatened and Endangered Species

The Federal Endangered Species Act (FESA) of 1973 as amended (USC 1531–1544) protects plant and wildlife species that are endangered or threatened with extinction. The United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) are responsible for administering the FESA and determining whether certain taxa should be designated as endangered, threatened, proposed, or candidate species. Endangered species are in danger of becoming extinct throughout all or a significant portion of their range, whereas threatened species are at significant risk of becoming endangered in the foreseeable future. Proposed species are those under consideration for being designated as either endangered or threatened. Candidate species have not yet been formally designated as any of the aforementioned, but are regarded as candidates for listing. Plants are protected under FESA only if "take" were to occur on federal lands or as a result of federal actions.

Section 9 of the FESA prohibits the take of listed fish and wildlife, where "take" is defined as "...harass, harm [including adverse modification or degradation of Critical Habitat], pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct..." (16 USC 1531; 50 CFR 17.3). This prohibition also applies to "incidental take," which is defined as take that is "incidental to, but not the intended purpose of, an otherwise lawful activity" (16 USC 1539[a][1][B]). Under Section 7 of the FESA, consultation with the USFWS and/or NMFS is required if actions, including permit approvals or funding, could adversely affect species listed under FESA or any Critical Habitat designated for listed species. Formal consultations result in a determination as to whether a proposed action(s) is likely to jeopardize the continued existence of a listed species, or destroy or adversely modify its designated Critical Habitat.

Critical Habitat

Some federally-listed species also have designated Critical Habitat. Critical Habitat refers to specific geographical areas with physical and biological features essential to the survival and recovery of a federally-listed species and may require protection or other special management considerations. Critical Habitats are designated at the time a species becomes federally listed unless there is insufficient information at the time of listing (or it is otherwise imprudent to do so) and detailed descriptions are published in both the Federal Register and Code of Federal Regulations (50 CFR 226).

Magnuson-Stevens Fishery Conservation and Management Act (MSA) and Essential Fish Habitat

The Magnuson-Stevens Fishery Conservation and Management Act (MSA) as amended (USC 94–265) was first passed in 1976 and has subsequently been revised twice through the Sustainable Fisheries Act of 1996 and the MSA Reauthorization Act of 2007. The primary goals of this combined body of legislation were to ensure a sustainable fishery by establishing scientific methods and standards to prevent over-fishing, rebuild overfished stocks, and protect both food resources as well as essential habitat for all fish life history stages. The Sustainable Fisheries Act in particular established requirements for the identification and creation of "Essential Fish Habitat" and "Habitat Areas of Particular Concern," as well as an associated consultation process to advise federal agencies with regard to the avoidance and/or mitigation of adverse effects on such habitats.

Essential Fish Habitat is considered to be that habitat which is necessary for federally-managed fish and invertebrate species to complete their entire life cycle and continue to contribute to populations that can be harvested sustainably. Essential Fish Habitat may overlap with Critical Habitat designated for federally listed fish species but is only designated for federally-managed marine and anadromous fish and invertebrates; it does not apply to strictly freshwater species.

Migratory Bird Treaty Act (MBTA)

The Migratory Bird Treaty Act (MBTA) of 1918 (USC 703–711) protects all migratory birds against take, including "incidental take." Birds protected under the MTBA include all native waterfowl, shorebirds, hawks, eagles, owls, doves, ravens, crows, swifts, martins, swallows, and other songbirds, and protections extend to include active nests and eggs, as well as any body parts (feathers, plumes etc.). A complete list of species protected under the MBTA can be found at 50 CFR 10.13.

Bald and Golden Eagle Protection Act (BGEPA)

The Bald and Golden Eagle Protection Act (BGEPA) of 1940 (USC 668) specifically protects Bald Eagle (*Haliaeetus leucocephalus*) and Golden Eagle (*Aquila chrysaetos*) and their nests from take or trade in parts of either species.

Federally-Protected Wetlands and Waters of the United States

Section 404 of the federal Clean Water Act (33 U.S.C 1344) and Section 10 of the Rivers and Harbors Act (33 USC 403) regulate actions affecting navigable and other special waters of the U.S., including wetlands. The Clean Water Act, as amended, designates the U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (EPA) as the primary federal agencies with regulatory jurisdiction over impacts to wetlands and other waters of the United States, but the Act does not define "waters of the U.S." The term "waters of the U.S." has instead been defined by the EPA and USACE through regulation since 1970s. This definition has undergone numerous changes, including as recently as 2023, wherein, the "Revised Definition of 'Waters of the United States' rule" was published on 18 January 2023 (88 FR 3004), which became effective in March, but was subsequently amended in August 2023 to conform to a U.S. Supreme Court ruling that occurred during the interim.

At present, this "Revised Definition of 'Waters of the United States'; Conforming" rule (88 FR 61964 [September 8, 2023]) limits waters of the U.S. (33 CFR 328.3[a]) to:

1. "Waters which are:
    i. currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
    ii. Territorial seas; or

   iii. interstate waters;
2. Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (5) of this section;
3. Tributaries of waters identified in paragraph (1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;
4. Wetlands adjacent to the following waters:
   i. Waters identified in paragraph (1) of this section; or
   ii. Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (2) or (3) of this section and with a continuous surface connection to those waters;
5. Intrastate lakes and ponds not identified in paragraphs (1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (1) or (3) of this section."

This most recent rule also provides for some exceptions to waters that otherwise meet terms of paragraphs (a)(2)–(5) above, such as for federally designated prior converted croplands, ponds associated with waste water treatment systems, depressions in dry land created by active construction projects, ditches constructed wholly in dry land that do not carry relatively permanent water, and certain other artificially-created scenarios (33 CFR 328.3[b]).

The common definition of "wetlands" utilized by both the EPA and the USACE has not changed since its adoption in 1980 (40 CFR 230.3[t] [45 FR 85346]) and 1986 (33 CFR 328.3[c] [51 FR 41250]), respectively. Both agencies define wetlands as:

> "...those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas."

STATE

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) of 1970 as amended (CA PRC 2100 *et. seq*.) and associated guidelines (CA CR Title 14, Division 6, Chapter 3 1500–15387) have been introduced previously elsewhere herein. Below, we focus on those aspects of CEQA and the associated guidelines that pertain to consideration of biological resources during the environental review process.

CEQA requires an evaluation of potential impacts of projects that, among other potential criteria, have the potential to:

> "…substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species; or eliminate important examples of the major periods of California history or prehistory" (CEQA Guidelines, Section 15065[a][1]);

or of projects that are of statewide, regional, or areawide significance including those which, among other potential criteria, would:

> "…substantially affect sensitive wildlife habitats including but not limited to riparian lands, wetlands, bays, estuaries, marshes, and habitats for endangered, rare and threatened species as defined by Section 15380 of this Chapter" (CEQA Guidelines, Section 15206[b][5]).

CEQA Guidelines, Section 15380 defines "endangered, rare, or threatened species" as follows:

> (a) "Species" as used in this section means a species or subspecies of animal or plant or a variety of plant.
> (b) A species of animal or plant is:
> (1) "Endangered" when its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors; or
> (2) "Rare" when either:
> (A) Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or
> (B) The species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered "threatened" as that term is used in the Federal Endangered Species Act.
> (c) A species of animal or plant shall be presumed to be endangered, rare or threatened, as it is listed in:
> (1) Sections 670.2 or 670.5, Title 14, California Code of Regulations; or
> (2) Title 50, Code of Federal Regulations Section 17.11 or 17.12 pursuant to the Federal Endangered Species Act as rare, threatened, or endangered.
> (d) A species not included in any listing identified in subdivision (c) shall nevertheless be considered to be endangered, rare or threatened, if the species can be shown to meet the criteria in subdivision (b).

The CEQA review process also further provides for consideration of whether a proposed project would have substantial adverse effects on:

> "…any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service" (CEQA Guidelines, Appendix G Environmental Checklist sample questions IV[a]); or
>
> "…any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service" (CEQA Guidelines, Appendix G Environmental Checklist sample questions IV[b]);

or if a proposed project would:

> "…interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites" (CEQA Guidelines, Appendix G Environmental Checklist sample questions IV[d]).

Although other natural communities may be considered sensitive and also require CEQA consideration, herein, "Sensitive Natural Communities" include those described vegetation communities (i.e., vegetation Alliances and/or Associations [CNPS 2023a]), for which the California Department of Fish and Wildlife's Vegetation Classification and Mapping Program (VegCAMP) and the California Native Plant Society (CNPS) have assigned a state rarity rank of 1-3 (CDFW 2023a; see also Table 2 in Appendix B), using NatureServe's "Heritage Methodology" (NatureServe 2023). This is the same system used by the California Natural Diversity Database (CNDDB) and others to assign global and state rarity ranks to individual species, and allows for a more empirical method of providing a reliable, consistent, and transparent evaluation of the level of risk of extinction of a given taxon or ecosystem.

California Endangered Species Act (CESA)

The California Endangered Species Act (CESA) of 1970 as amended (CFGC Division 3, Chapter 1.5 2050–2068) protects plant and wildlife species that are endangered or threatened with extinction as well, however under this Act, the California Department of Fish and Wildlife (CDFW) is responsible for administering the CESA and determining whether certain taxa should be designated as endangered, threatened, proposed, or candidate species. Title 14, California Code of Regulations (Section 670.2 and 670.5) lists threatened or endangered animals in California.

California Special Status Designation

The California Department of Fish and Wildlife maintains lists of "Special" animals and plants. "Special" status applies to "species, subspecies, Distinct Population Segments (DPS), or Evolutionarily Significant Units (ESU) where at least one of the following conditions applies:

- Officially listed or proposed listing under the state or federal Endangered Species Acts (CESA/FESA);
- Taxa considered by CDFW to be a Species of Special Concern (SSC);
- Taxa which meet the criteria for listing, even if not included on any list, as described in Section 15380 of the CEQA guidelines;
- Taxa that are biologically rare, very restricted in distribution, or declining throughout their range but not currently threatened by extirpation.
- Population(s) in California that may be peripheral to the major portion of a taxon's range but are threatened with extirpation in California;
- Taxa strongly associated with habitats that are declining in California at a significant rate (e.g., wetlands, riparian, vernal pools, native grasslands, old-growth forests, desert aquatic systems, valley shrubland habitats, etc.);
- Taxa designated as special status, sensitive or declining species by state or federal agencies, or a non-governmental organization and determined to by the California Natural Diversity Database (CNDDB) to be rare, restricted, declining or threatened across their range in California."

Among these California special status taxa are Fully Protected Species, Species of Special Concern, Watch List species, and plants protected under the Native Plant Protection Act.

California "Fully Protected Species"

California Fish and Game Code designates certain animal species as "Fully Protected" under Sections 3511 (birds), 4700 (mammals), 5050 (reptiles and amphibians), and 5515 (fish). Fully Protected species are species that are rare or face possible extinction, despite not being listed as threatened or endangered and such species may not be taken or possessed at any time. California's definition of "take" differs

slightly from the federal definition. Section 86 of the California Fish and Game Code defines take as "...hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

California "Species of Special Concern"

California Species of Special Concern are known to have declining populations, have limited ranges, or are otherwise vulnerable to extinction. This status is intended by CDFW to prevent the eventual listing of such species as threatened or endangered by implementing pre-emptive conservation measures.

California "Watch List" Species

Watch Listed species are monitored by the California Department of Fish and Wildlife to determine if increased protective status designation becomes warranted. Species on CDFWs "Watch List" are:

- "not on the current Special Concern list but were on previous lists and they have not been state listed under CESA;
- were previously state or federally listed and now are on neither list; or
- are on the list of 'Fully Protected' species."

Nesting Birds Protections

California Fish and Game Code Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.

Raptor Protections

California Fish and Game Code Section 3503.5 specifically protects raptors (birds in the orders Falconiformes and Strigiformes) from take, possession, or destruction of any such bird, including their nests or eggs.

California Native Plant Protection Act (NPPA)

The Native Plant Protection Act (NPPA) prohibits the taking, possession, or sale of any plant with the state designation of rare, threatened or endangered as defined by the California Department of Fish and Wildlife (CDFW), with some exceptions (CFGC, Division 2, Chapter 10, Section 1900 *et seq*.). CDFW administers the NPPA using the California Native Plant Society's (CNPS) *Inventory of Rare and Endangered Plants of California* (CNPS 2023b), and generally considers plants with designated "Rare Plant Ranks" of 1A, 1B, 2A, 2B, 3 and 4 (Appendix B, Table 2).

Oak Woodlands Conservation Act

California's Oak Woodlands Conservation Act (SB 1334) has been included in CEQA statute as Section 21083.4. The Act requires Counties in California to evaluate if projects will significantly affect oak woodlands and, if so, implement mitigation for such effects through avoidance, conservation easements, replanting, compensatory projects, and/or other effective forms of mitigation.

State-Protected Wetlands and Waters of the State

As stated previously herein, the CEQA review process requires an evaluation of potential impacts of projects that, among other potential criteria, would substantially affect riparian lands, wetlands, bays, estuaries, and marshes (CEQA Guidelines, Section 15206[b][5] and Appendix G Environmental Checklist sample questions IV[b]). CEQA Guidelines, Appendix G Environmental Checklist sample questions X[a]–[e] provide additional guidance for assessment of potential impacts to aquatic resources, which support many of the aforementioned species and their habitats. Therein, project proponents are tasked with evaluating whether a proposed project would substantially degrade, decrease, interfere with, or alter

water quality, water availability, groundwater recharge, or other important hydrological mechanisms and/or functions.

The state of California maintains independent regulatory authority over impacts to wetlands and other waters of the state under Sections 401 and 402 of the federal Clean Water Act (33 USC 1341 and 1342 and 40 CFR 121 and 122) as amended, and the Porter-Cologne Water Quality Control Act (California Water Code 13000 *et seq*.). The state agency with primary regulatory responsibility for waters of the state is the State Water Resources Control Board (SWRCB) and its nine regional boards. The North Coast Regional Water Quality Control Board (NCRWQCB) maintains jurisdiction over all water resources in its regulatory scope, including isolated wetlands and headwaters in the region that includes the City of Willits Planning Area.

"Waters of the state" are defined in the California Water Code (Division 7, Chapter 2 Section 13050[e]) as:

> "...any surface water or groundwater, including saline waters, within the boundaries of the state"

and include all waters of the U.S., natural wetlands, wetlands created by modification of a surface Water of the state, as well as some artificial wetlands as described in the SWRCB's *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (adopted 2 April 2019 and revised 6 April 2021). Therein, the SWRCB also defines a wetland as an area which, under normal circumstances:

1. "…has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both;
2. the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and
3. the area's vegetation is dominated by hydrophytes or the area lacks vegetation."

The SWRCB's wetland definition is largely consistent with that provided by the USACE (1987) and differs substantively only in that the former explicitly recognizes the potential existence of unvegetated wetland habitats and recognizes that some wetlands may occur where supportive substrates may not technically qualify as "soils."

Within the state of California, development potentially affecting wetlands and/or other waters of the state is also subject to review by the California Department of Fish and Wildlife (CDFW) (California Fish and Game Code 1600–1607), which serves as a trustee agency pursuant to the California Environmental Quality Act (CEQA). CDFW also serves in an advisory capacity regarding impacts to wetland habitats, and is generally a commenting agency for actions subject to CEQA and other local, county and/or state environmental review processes. CDFW utilizes a third, and more inclusive definition of wetlands, originally presented in the U.S. Fish and Wildlife Service's (USFWS) *Classification of Wetlands and Deepwater Habitats of the United States* (Cowardin et al. 1979):

> "Wetlands are lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. For the purposes of this classification wetlands must have one or more of the following three attributes:
>
> (1) at least periodically, the land supports predominantly hydrophytes;
> (2) the substrate is predominantly undrained hydric soil; and

(3) the substrate is non-soil and is saturated with water or covered by shallow water at some time during the growing season of each year."

Lake and Streambed Alteration Program

Where actions may encroach upon wetlands and/or waters of the state within California, CDFW requires prior notification through their Lake and Streambed Alteration (LSA) Agreement process (California Fish and Game Code 1600–1607). Such notification is specifically required before the commencement of any actions that may:

- "divert or obstruct the natural flow of any river, stream, or lake;
- change the bed, channel, or bank of any river, stream, or lake;
- use material from any river, stream, or lake; or
- deposit or dispose of material into any river, stream, or lake."

Rivers, streams, and/or lakes subject to this requirement include intermittent features which may be dry for periods of time, as well as those that remain wet throughout the year.

Cortese–Knox–Hertzberg Local Government Reorganization Act

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 is a California state law that outlines procedures and regulations, and establish a Local Agency Formation Commissions (LAFCo) in each county to regulate the reorganization of local government entities. The primary goal of the Act is to provide a structured process for the consolidation, merger, annexation, or dissolution of cities and special districts. LAFCOs' primary focus is to: discourage urban sprawl, encourage orderly governmental boundaries, and to preserve open-space and prime agricultural lands.

REGIONAL AND LOCAL

Mendocino County Local Area Formation Commission (LAFCo)

Section 10 of the Mendocino County LAFCo Policies and Procedures Manual defines local policies relating to the establishment of local agency spheres of influence (SOI). According to these policies, an SOI is the probable 20-year growth boundary for a jurisdiction's physical development. The Mendocino LAFCo uses SOIs to:

- promote orderly growth and development within and adjacent to communities;
- promote cooperative planning efforts among cities, the County, and special districts to address concerns regarding land use and development standards, premature conversion of agriculture and open space lands, and efficient provision of public services;
- guide future local government reorganization that encourages efficiency, economy, and orderly changes in local government; and
- assist property owners in anticipating the availability of public services in planning for the use of their property.

Additional Mendocino LAFCo SOI policies include 10.1.7, Agriculture and Open Space Lands, which states that territory not in need of urban services, including open space, agriculture, recreational, rural lands, or residential rural areas shall not be assigned to an agency's sphere of influence unless the area's exclusion would impede the planned, orderly and efficient development of the area. In addition, 10.1.8 Annexations Are Not Mandatory, states that territory within an agency's sphere will not necessarily be annexed. A sphere is only one of several factors that are considered by LAFCo when evaluating changes of organization or reorganization.

In approving SOIs, the Mendocino LAFCo must prepare a written statement of its determinations with respect to each of the following criteria (Government Code 56425[e]):

- The present and planned land uses in the area, including agricultural and open-space lands.
- The present and probable need for public facilities and services in the area.
- The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.
- The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency.
- For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, that occurs pursuant to subdivision (g) on or after July 1, 2012, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

Mendocino County General Plan

The revised (2020) Resource Management Element of the Mendocino County General Plan (https://www.mendocinocounty.org/home/showpublisheddocument/54487/638055061981600000) includes goals, policies, and action items which recognize the importance of the County's natural resources and intend to establish protections for such resources. The County's Resource Management Element is currently applicable to unincorporated portions of the Planning Area including the City's proposed expanded Sphere of Influence, and stated goals germane to the current biological resource analysis therein include:

Goal RM-1 (Watersheds) Land uses, development patterns, and practices that facilitate functional and healthy watershed ecosystems.

Goal RM-2 (Water Supply) Protection, enhancement, and management of the water resources of Mendocino County.

Goal RM-3 (Water Quality) Land use development and management practices that protect or enhance water quality.

Goal RM-4 (Ecosystems) Protection and enhancement of the county's natural ecosystems and valuable resources.

Goal RM-5 (Ecosystems) Prevent fragmentation and loss of the county's oak woodlands, forests, and wildlands and preserve their economic and ecological values and benefits.

Goal RM-7 (Biological Resources) Protection, enhancement, and management of the biological resources of Mendocino County and the resources upon which they depend in a sustainable manner.

Goal RM-8 (Marine Resources) Protection and restoration, and enhancement of Mendocino County's freshwater and marine environments.

Goal RM-11 (Forestry) To protect and enhance the county's diverse forest resources for all uses, including timber harvest.

Goal RM-12 (Soil Resources) Protection, enhancement, and management of the soil resources of Mendocino County.

Goal RM-13 (Mineral Resources) Mineral resources conserved and used in a manner compatible with environmental, social, and economic objectives.

Goal RM-15 (Dark Sky) Protection of the qualities of the county's nighttime sky and reduced energy use.

City of Willits General Plan—Vision 2020

Policies, implementation measures, and mitigation measures of the *Willits General Plan Revision, Vision 2020* (1992) Conservation and Open Space Element are intended to provide protections for biological resources. The stated goal of the Conservation and Open Space Element is as follows:

3.100 Conservation and Open Space Goal — To ensure that the future growth of Willits occurs in a manner which minimizes adverse impacts on the City's existing plants, wildlife, open space and natural resources.

Existing policies directly pertaining to biological resources and/or their protection therein include:

3.210 Conserve, to the greatest feasible extent, the City's existing natural resources, with particular emphasis on air and water quality, open space, tree preservation and riparian habitat maintenance and enhancement.

3.220 Ensure that all adverse environmental impacts of proposed development projects are identified and acceptably mitigated prior to approval.

3.230 Ensure that environmental mitigation measures included as conditions of project approval are effectively implemented and maintained over the long term.

3.260 Cooperate with regional and state agencies in programs designed to reduce air and water pollution levels.

3.280 Initiate and/or support local and regional recycling programs, air quality policies, water conservation and watershed preservation efforts.

Applicable Conservation and Open Space Implementation Measures include:

3.310 Pursuant to state environmental law, mitigation monitoring programs shall be included as part of the environmental review process for all projects requiring an Environmental Impact Report or Mitigated Negative Declaration. Mitigation monitoring programs shall specify how each mitigation measure will be implemented, which individual or agency will be responsible for follow-up and the time schedule that will be followed in monitoring project mitigation efforts.

3.320 All applications for development within 250 feet of Willits, Broaddus or Baechtel Creeks shall be required to include site-specific field observation by a qualified botanist and a wildlife biologist as part of the application package. This requirement may be waived in the event that the City's Environmental Review Officer determines that the proposed project will have no impact on the riparian corridor or that the site in question has been previously disturbed to the extent that the proposed project would be of minimal environmental concern.

3.360 Appoint, by December 1992, a committee to identify local trees of significance and to make recommendations to the City Council toward the formulation of a Tree Preservation Ordinance. Adopt, by December 1993, a City-wide Tree Preservation Ordinance.

Mitigation measures provided in the Environmental Impact Report developed for the City's previous General Plan update in 1992, which are a part of the Conservation and Open Space Element include:

4.731 Site-specific environmental review of all residential, commercial and industrial development proposals shall be required; extra scrutiny shall be given to projects along riparian corridors and in areas containing Valley Oak Woodland or other habitats or species of significance.

4.732 Field investigation by a qualified botanist should be conducted in relation to the proposed U.S. 101 bypass to ensure that its ultimate alignment will not pose an unmitigable threat to the Baker's Meadowfoam located east of the existing roadway in the northern part of the incorporated city.

4.733 The City shall pass, by December 1993, an ordinance calling for the preservation of Valley Oaks and other trees of significance.

4.734 City planning staff shall closely review all proposals for improved vehicular access to Brooktrails and provide written comments to the lead agency to ensure that the impacts of the project on riparian habitat are effectively mitigated.

4.135 Revegetation of sites using native species may be required as a condition of approval for development projects.

4.736 The City shall conform to the California Department of Fish and Game policy of no net loss of wetlands in the review of proposed development projects.

4.834 Preserve trees and other significant visual features through enforcement of existing ordinances and enactment of new ordinances where appropriate.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS

Three types of potential impacts or effects are identified in the CEQA Guidelines (CA CR Title 14, Division 6, Chapter 3) as requiring consideration:

1. Direct (Section 15358) — Direct or primary effects which are caused by the project and occur at the same time and place.
2. Indirect (Section 15358) — Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.
3. Cumulative (Section 15355) — Cumulative effects are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.
    a. The individual effects may be changes resulting from a single project or a number of separate projects.
    b. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other

closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

As provided in *Appendix G: Environmental Checklist Form* of the CEQA Guidelines (CA CR Title 14, Division 6, Chapter 3), the current Project would significantly affect biological resources if it would:

1. have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
2. have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
3. have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
4. interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
5. conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
6. conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

When determining if environmental effects meet the threshold of being substantial, evaluation of any such effects on biological resources should include consideration of both spatial (e.g., local, regional, etc.) and population-level (e.g., genetic diversity, etc.) contexts, in addition to the potentially-affected resources themselves. Temporary and/or localized impacts, which might not necessarily jeopardize or otherwise significantly compromise a sensitive biological resource are possible, and may not reach the threshold of being substantial within the CEQA context.

METHODOLOGY

A description of the methodologies used in this programmatic analysis of potential Project effects on biological resources follows.

Initial investigations included the review of scientific literature and natural resource database occurrence records as well as informal discussions with other local resource experts to assess the breadth of special status taxa, associated habitats, and other sensitive biological resources that could potentially be affected by the Project. Specific databases and other sources of natural resource information utilized included:

- U.S. Fish and Wildlife Service's (USFWS) National Wetland Inventory (USFWS 2023a);
- USFWS' Information for Planning and Consultation (IPaC) (USFWS 2023b);
- California Department of Fish & Wildlife's (CDFW) Natural Diversity Database (CNDDB 2023);
- CDFW's Biogeographic Information and Observation System (BIOS 2023);
- Nature Serve (2023);
- eBird (2023);
- iNaturalist (2023);
- Consortium of California Herbaria Portal (CCH1 2023)

- Calflora (2023);
- California Native Plant Society's (CNPS) *Online Inventory of Rare, Threatened, and Endangered Plants of California* (CNPS 2023b);
- CNPS's Manual of California Vegetation Online (CNPS 2023a);
- EcoAtlas and San Francisco Estuary Institute's (SFEI) California Aquatic Resource Inventory (CARI) standardized statewide map of surface waters, wetlands, and their riparian areas (SFEI 2023);
- and others.

Queries of the aforementioned data sources focused on the Willits and eight (8) surrounding 7.5-minute U.S. Geological Survey (USGS) quadrangles (i.e., Longvale, Willis Ridge, Brushy Mountain, Foster Mountain, Redwood Valley, Laughlin Range, Greenough Ridge, and Burbeck), though investigations extended further where warranted. While the aforementioned resources can be useful for ascertaining reported occurrence information, it is important to bear in mind that they are "positive reporting" tools, and it should not necessarily be presumed that a lack of any reported occurrence data for a particular location indicates the absence, or lack of suitable habitat, at that location for taxa of interest.

Evaluation of environmental conditions within the Planning Area and potential habitat suitability for the various identified sensitive biological resources under consideration relied primarily on the analysis of aerial imagery (e.g.; Esri, Maxar, Earthstar Geographics, and the GIS User Community 2023; Google Earth Pro 2023; etc.), personal familiarity with portions of the Planning Area and taxa under consideration, and information obtained through the aforementioned initial investigations. However, the SoilWeb online web applications (UC Davis 2023), informal discussions and correspondence with additional local resource experts, and observations made during brief targeted field reconnaissance conducted on 10 January 2023 further informed this analysis. Given the breadth and scope of the Project, and the associated geographic extent of the Planning Area, no focused seasonally-appropriate species-level botanical, wildlife, or other field surveys or investigations (e.g., wetland delineations, etc.) were performed as part of this effort.

ASSUMPTIONS

The proposed Project is intended to facilitate growth and also has the potential to induce additional future growth indirectly. The Land Use Element Update assumes that the City population will grow to 7,500 during the Planning Period; however, the timing, location, and scale, future development consistent with the Project is unknown. In order to ensure that potential impacts to biological resources are not underestimated in this analysis, we assume the maximum realization of potential development for which the Land Use Element Update and Sphere of Influence Amendment are intended to accommodate.

PROJECT IMPACTS AND MITIGATION

The Project does have the potential to result in significant direct, indirect, and/or cumulative impacts on biological resources identified previously herein. A summary of potentially significant impacts and corresponding proposed mitigation follows.

Impact BIO-01: Potentially Significant Impacts to Special Status and/or Otherwise Protected Fish, Wildlife, and/or Botanical Taxa

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Future development facilitated by the Project does have the potential to result in direct, indirect, and/or cumulative adverse impacts to special status and/or otherwise protected fish, wildlife, and/or botanical

taxa within the incorporated City limits, the proposed expanded Sphere of Influence, and/or elsewhere within the Planning Area. Such impacts would be considered significant without sufficient mitigation.

Direct Impacts

Potential significant impacts include the incidental take of special status and/or otherwise protected organisms during the implementation of ministerial and/or discretionary projects that modify or otherwise encroach upon occupied habitats within the Planning Area. Ministerial and/or discretionary projects that involve instream work (e.g., road or utility crossings, etc.) could result in the incidental take of special status aquatic (or semi-aquatic) organisms (including their eggs, larva, and/or immature individuals) such as state- and/or federally-listed Coho Salmon (*Oncorhynchus kisutch*—Southern Oregon/Northern California ESU), Chinook Salmon (*Oncorhynchus tshawytscha*—California Coastal ESU), and "winter-run" Steelhead (*Oncorhynchus mykiss irideus*—Northern California DPS); as well as other stream-dependent or associated special status organisms such as Pacific Lamprey (*Entosphenus tridentatus*), California Floater (*Anodonta californiensis*), Northwestern Pond Turtle (*Emys marmorata*), Red-bellied Newt (*Taricha rivularis*), and/or Foothill Yellow-legged Frog (*Rana boylii*).

Development-related impacts to occupied terrestrial or arboreal habitats within the Proposed Sphere of Influence or within the City of Willits' proposed Land Use Change Areas as part of ministerial and/or discretionary projects could similarly result in the direct take of state- and/or federally-listed taxa; other special status organisms; and/or otherwise protected raptors, nesting birds, roosting bats, denning mammals, and/or egg or larval stages of the federal candidate species, Western Monarch butterfly (*Danaus plexippus plexippus*); incidental to the removal or modification of trees, shrubs, grasslands, or other vegetated habitats. Excavation, grading, road construction, and/or other similar earthwork related to such projects could also result in the incidental take of [at least partially] fossorial special status wildlife such as federally-proposed threatened Northwestern Pond Turtle (*Emys marmorata*), state candidate endangered Western Bumble Bee (*Bombus occidentalis*), Obscure Bumble Bee (*Bombus caliginosus*), American Badger (*Taxidea taxus*), and Red-bellied Newt (*Taricha rivularis*). Demolition of abandoned buildings and other anthropogenic structures, as well as construction or replacement of bridges, trestles, etc. could also potentially result in the incidental take of roosting and/or hibernating special status bats including Pallid Bat (*Antrozous pallidus*), Townsend's Big-eared Bat, (*Corynorhinus townsendii*), Western Mastiff Bat (*Eumops perotis californicus*), Silver-haired Bat (*Lasionycteris noctivagans*); and/or other special status mammals such as Northern California Ringtail (*Bassariscus astutus raptor*).

The aforementioned forms of habitat modification incidental to ministerial and/or discretionary projects facilitated by the Project could also result in the direct removal of *in situ* special status botanical species such as North coast semaphore grass (*Pleuropogon hooverianus*), Davy's semaphore grass (*Pleuropogon californicus* var. *davyi*), Baker's meadowfoam (*Limnanthes bakeri*), Baker's Navarretia (*Navarretia leucocephala* ssp. *bakeri*), Bolander's catchfly (*Silene bolanderi*), glandular western flax (*Hesperolinon adenophyllum*), white-flowered rein orchid (*Piperia candida*), grass Alisma (*Alisma gramineum*), and others (Table 2; Appendix B, Table 2).

Representative examples of special status or otherwise protected organisms known from—or that have reasonable potential to occur within—generalized habitat types identified within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas, and which could be subject to such direct impacts, follow. Tables 3.4a and 3.4b, and Appendix B should also be referenced for a more complete accounting of potentially-affected special status taxa.

Special Status Organisms Associated with Riparian Habitats

Potentially affected special status aquatic organisms associated with streams and riparian habitats include state- and/or federally-listed Coho Salmon (*Oncorhynchus kisutch*—Southern Oregon/Northern California ESU), Chinook Salmon (*Oncorhynchus tshawytscha*—California Coastal ESU), and "winter-run" Steelhead (*Oncorhynchus mykiss irideus*—Northern California DPS); as well as other stream-dependent or associated special status organisms such as federally-proposed threatened Northwestern Pond Turtle (*Emys marmorata*), Pacific Lamprey (*Entosphenus tridentatus*), California Floater (*Anodonta californiensis*), Red-bellied Newt (*Taricha rivularis*), Foothill Yellow-legged Frog (*Rana boylii*), and possibly Northern Red-legged Frog (*Rana aurora*). Riparian habitats within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas also provide important breeding, foraging, roosting, denning, refuge, developmental, migratory, and dispersal habitats for numerous non-aquatic special status organisms considered in this analysis as well (Appendix B).

Some of the riparian-associated special status bird species potentially affected by the Project include federal threatened and state endangered Western Yellow-billed Cuckoo (*Coccyzus americanus occidentalis*), federal and state threatened Northern Spotted Owl (*Strix occidentalis caurina*), and state endangered Willow Flycatcher (*Empidonax traillii brewsteri*), as well as White-tailed Kite (*Elanus leucurus*), Purple Martin (*Progne subis*), Yellow Warbler (*Setophaga petechia*), Yellow-breasted Chat (*Icteria virens*), Cooper's Hawk (*Accipiter cooperi*), Sharp-shinned Hawk (*Accipiter striatus*), Black-crowned Night Heron (*Nycticorax nycticorax*), Great Blue Heron (*Ardea herodias*), and others (Appendix—B, Table 1). Riparian-associated special status mammal species potentially affected by the Project include Northern California Ringtail (*Bassariscus astutus raptor*), and the following bats: Pallid Bat (*Antrozous pallidus*), Townsend's Big-eared Bat (*Corynorhinus townsendii*), Western Mastiff Bat (*Eumops perotis californicus*), Silver-haired Bat (*Lasionycteris noctivagans*), and Western Red Bat (*Lasiurus frantzii*).

Numerous special status botanical species are also known from, or have reasonable potential to occur within, stream- or wetland- associated riparian habitats throughout the Planning Area (Appendix B, Table 2), as are other important plants (e.g., milkweeds [*Asclepias* spp.], etc.) that provide critical breeding and migratory habitat for the federal candidate species, Western Monarch butterfly (*Danaus plexippus plexippus*). Some of the riparian-associated special status botanical species potentially affected by the Project include Davy's semaphore grass (*Pleuropogon californicus* var. *davyi*), north coast semaphore grass (*Pleuropogon hooverianus*), Baker's meadowfoam (*Limnanthes bakeri*), Baker's Navarretia (*Navarretia leucocephala* ssp. *bakeri*), saline clover (*Trifolium hydrophilum*), Nuttall's ribbon-leaved pondweed (*Potamogeton epihydrus*), grass Alisma (*Alisma gramineum*); three epiphytic lichens: Methuselah's beard lichen (*Dolichousnea longissima*), angel's hair lichen (*Ramalina thrausta*), and grooved beard lichen (*Sulcaria badia*); Bolander's Bruchia moss (*Bruchia bolanderi*); and others (Appendix B, Table 2).

Special Status Organisms Associated with Upland Forests and Woodlands

Potential impacts to other forest and woodland plant communities within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas, not considered to be "riparian" could also directly affect special status and/or otherwise protected organisms. Such forested habitats also provide important breeding, foraging, roosting, denning, refuge, developmental, migratory, and dispersal habitats for numerous organisms considered in this analysis (Appendix B).

Potentially affected special status bird species associated with such upland forested habitats within the Planning Area include state endangered Bald Eagle (*Haliaeetus leucocephalus*), federal and state threatened Northern Spotted Owl (*Strix occidentalis caurina*), White-tailed Kite (*Elanus leucurus*), Vaux's

Swift (*Chaetura vauxi*), American Goshawk (*Accipiter atricapillus*), Purple Martin (*Progne subis*), Osprey (*Pandion haliaetus*), Cooper's Hawk (*Accipiter cooperi*), Sharp-shinned Hawk (*Accipiter striatus*), and Lawrence's Goldfinch (*Spinus lawrencei*). Forest-associated special status mammal species potentially affected by the Project include Northern California Ringtail (*Bassariscus astutus raptor*), Fisher (*Pekania pennanti* Northern California/Southern Oregon DPS), Sonoma Tree Vole (*Arborimus pomo*), and the following bats: Pallid Bat (*Antrozous pallidus*), Townsend's Big-eared Bat (*Corynorhinus townsendii*), Western Mastiff Bat (*Eumops perotis californicus*), Silver-haired Bat (*Lasionycteris noctivagans*), and Western Red Bat (*Lasiurus frantzii*). Forested habitats, particularly within the northern portion of the Planning Area, and potentially within the proposed expanded Sphere of Influence and incorporated City limits, could also serve as migratory corridors for Tule Elk (*Cervus canadensis nannodes*), and more open and sparsely-forested upland oak woodlands throughout the Planning Area could potentially support American Badger (*Taxidea taxus*).

Special status botanical species associated with upland and/or seasonally mesic forests within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas, that could potentially be affected by the Project are numerous (Appendix B, Table 2) but some representative examples include those from more open and sparsely forested upland oak woodlands such as north coast semaphore grass (*Pleuropogon hooverianus*), Davy's semaphore grass (*Pleuropogon californicus* var. *davyi*), Baker's meadowfoam (*Limnanthes bakeri*), Baker's Navarretia (*Navarretia leucocephala* ssp. *bakeri*), Bolander's catchfly (*Silene bolanderi*), glandular western flax (*Hesperolinon adenophyllum*), Purdy's fritillary (*Fritillaria purdyi*), bristly Leptosiphon (*Leptosiphon aureus*), large-flowered Leptosiphon (*Leptosiphon grandiflorus*), broad-lobed Leptosiphon (*Leptosiphon latisectus*), swamp larkspur (*Delphinium uliginosum*), Mendocino tarplant (*Hemizonia congesta* ssp. *calyculata*), Tracy's tarplant (*Hemizonia congesta* ssp. *tracyi*), and others from more dense, coniferous and/or mixed conifer-hardwood stands such as Humboldt County milk-vetch (*Astragalus agnicidus*), white-flowered rein orchid (*Piperia candida*), mountain lady's-slipper (*Cypripedium montanum*), redwood lily (*Lilium rubescens*), and others (Appendix B, Table 2). The same three epiphytic lichens and single moss species previously addressed as being potentially present in riparian forests could also potentially occur in forests not considered "riparian" within the Planning Area: Methuselah's beard lichen (*Dolichousnea longissima*), angel's hair lichen (*Ramalina thrausta*), grooved beard lichen (*Sulcaria badia*); and Bolander's Bruchia moss (*Bruchia bolanderi*).

Special Status Organisms Associated with Pasture and Grassland Habitats

Potential future development allowed by the Project within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas could also directly affect special status organisms as a result of the removal or further degradation of grassland habitats which are known to support nesting Grasshopper Sparrows (*Ammodramus savannarum*), a California species of special concern. Well-drained upland grassland and pasture habitats within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas also could provide overwintering, nesting, and/or burrowing habitat for the state candidate endangered Western Bumble Bee (*Bombus occidentalis*), the Obscure Bumble Bee (*Bombus caliginosus*), the federally proposed threatened Northwestern Pond Turtle (*Emys marmorata*), and/or the California species of special concern, American Badger (*Taxidea taxus*). The mapped home range of the Little Lake Valley herd of Tule Elk (*Cervus canadensis nannodes*) also includes much of the grassland and pasture habitats that occur within the northern portion of the incorporated City limits and further north within the Planning Area.

Special status botanical species associated with grassland and pasture habitats within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas that could

potentially be affected by the Project are numerous (Appendix B, Table 2) but some representative examples include Sonoma sunshine (*Blennosperma bakeri)*, Roderick's fritillary (*Fritillaria roderickii*), Milo Baker's lupine (*Lupinus milo-bakeri*), north coast semaphore grass (*Pleuropogon hooverianus*), Davy's semaphore grass (*Pleuropogon californicus* var. *davyi*), Baker's meadowfoam (*Limnanthes bakeri*), Baker's Navarretia (*Navarretia leucocephala* ssp. *bakeri*), Bolander's catchfly (*Silene bolanderi*), beaked Tracyina (*Tracyina rostrata*), congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *congesta*), glandular western flax (*Hesperolinon adenophyllum*), bristly Leptosiphon (*Leptosiphon aureus*), large-flowered Leptosiphon (*Leptosiphon grandiflorus*), Mendocino tarplant (*Hemizonia congesta* ssp. *calyculata*), Tracy's tarplant (*Hemizonia congesta* ssp. *tracyi*), harlequin lotus (*Hosackia gracilis*), swamp larkspur (*Delphinium uliginosum*), Bolander's Bruchia moss (*Bruchia bolanderi*), and others (Appendix B, Table 2). Milkweed species (*Asclepias* spp.) that occur among grassland and pasture habitats throughout the Planning Area, are also known to be used as important breeding and larval habitat for the federal candidate species, Western Monarch butterfly (*Danaus plexippus plexippus*).

Indirect and/or Cumulative Impacts

Anticipated development associated with the implementation of ministerial and/or discretionary projects facilitated by the Project could also lead to indirect and/or cumulatively considerable significant adverse effects on special status and/or otherwise protected fish, wildlife, and/or botanical taxa. In addition to the direct conversion of native vegetation and/or other types of habitats that support such protected organisms, other such potential adverse effects would primarily be attributable to substantial modifications of vegetation, hydrologic, edaphic, microclimatic, and/or other environmental conditions that could, individually or in aggregate, reduce and/or degrade habitats within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas that support such protected organisms to the extent that they are rendered unsuitable.

Depending upon the various combinations of habitat types and organisms of interest, multiple potential development-related factors could lead to substantial reductions in habitat suitability. Some reasonably foreseeable examples include the displacement of native vegetation resulting from the introduction and spread of invasive vegetation; the introduction and spread of non-native, competitive, predatory, and/or invasive wildlife species; increased harassment and predation associated with interactions between wildlife and domesticated or feral animals (e.g., house cats, etc.); reductions in plant pollinators or wildlife food resource availability; habitat fragmentation and reductions in habitat "patch" size; and altered surface water availability and/or hydrologic periodicity in streams and wetlands within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas.

In addition to potential limitations some of the aforementioned factors could impose on the carrying capacity of respective ecosystem components, habitat fragmentation and hydrologic interruption could also contribute to adverse microclimate changes, reduced availability of refugia and corresponding increases in predation rates, increased intra-and inter-species interactions and competition, as well as potential adverse effects on reproduction, migration, and/or dispersal potentials. Other potential indirect and/or cumulative significant adverse impacts to special status and/or otherwise protected organisms resulting from the Project include the increased exposure to potentially lethal pesticides as well as disorientation and disruptions to normal migratory and other nocturnal behaviors resulting from increased artificial light pollution.

While some of the aforementioned potential impacts are relatively self-explanatory, more detailed examples of other reasonably foreseeable potential indirect and/or cumulative adverse development-related effects on special status and/or otherwise protected organisms identified in this analysis follow. Other unforeseen impacts not included below are also possible.

Potential Impacts to Special Status Aquatic Organisms Due to Development-Related Hydrological Alterations

Increased impervious surface area associated with anticipated development could reduce infiltration and groundwater recharge which, in combination with potential increased upstream diversions to meet anticipated increased water use needs, could result in stranding-related mortality of state- and/or federally-listed, special status, and/or otherwise protected aquatic organisms during periods of low baseflows. Increased impervious surface area would also likely increase both the volume and velocity of unbuffered stormwater discharges to stream systems within the Planning Area, potentially resulting in increased erosion, channel incision, lowering of the adjacent water table, and the scouring of suitable in-channel spawning and breeding substrates along with associated dependent *in situ* aquatic organism life history stages (e.g., eggs, larvae, immature individuals, etc.). The resulting, increasingly episodic altered hydroperiods could also artificially stimulate migratory and/or other behavioral responses in affected aquatic organisms at inopportune times, resulting in stranding, displacement, and/or other adverse impacts, and could also decrease food resource availability for the aforementioned organisms. Anticipated increased development would also likely lead to increases in the abundance, transport, and delivery of fine sediments and other urban contaminants into nearby streams, further degrading aquatic habitat suitability and water quality, and increasing the exposure of special status aquatic organisms to urban contaminants and their deleterious effects.

Potential Impacts to Special Status Organisms Due to Removal or Degradation of Riparian Vegetation

Potential future development consistent with the Project could also adversely affect stream-dependent or associated special status organisms as a result of the removal or degradation of native riparian vegetation within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas leading to increased stream temperatures, reduced food resource availability, reduced surface area for biological and chemical degradation of urban contaminants, and reduced stream channel habitat complexity as a function of reductions in stochastic recruitment of logs and other coarse woody structural features. Reductions in, and/or degradation of, riparian vegetation associated with both stream channels and wetland habitats could also decrease the availability and/or suitability of such habitats within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas for use by federally-proposed threatened Northwestern Pond Turtle (*Emys marmorata*), as well as Red-bellied Newt (*Taricha rivularis*), Foothill Yellow-legged Frog (*Rana boylii*), and possibly Northern Red-legged Frog (*Rana aurora*) as important estivation or overwintering habitats, refugia during high-flow events, and/or overland foraging and migratory habitat during the wet season.

Potential development-related impacts to native riparian vegetation associated with streams and wetlands within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas could also adversely affect special status birds, bats, insects, plants, and other botanical species identified in this analysis (Tables 3.4a and 3.4b); as well as non-special status, but otherwise protected, raptors and other nesting and/or migratory birds. In addition to providing beneficial ecosystem services (e.g., flood-protection, stream bank stabilization, shading and microclimate buffering, biodegradation of urban pollutants, etc.) to local property owners and other members of the community, riparian plant communities within the Proposed Sphere of Influence and within the City of Willits' proposed Land Use Change Areas also provide important breeding, foraging, roosting, denning, refuge, developmental, migratory, and dispersal habitats for special status organisms from each of the aforementioned biotic groups (Appendix B, Tables 1 and 2).

Potential Impacts to Special Status Organisms Due to Removal or Degradation of Upland Forest, Woodland, and Grassland Habitats

Potential impacts to other upland forest, woodland, and grassland plant communities within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas not considered to be "riparian" could also adversely affect special status taxa, raptors, and otherwise protected nesting and/or migratory birds. In addition to providing important breeding, roosting, denning, refuge, developmental, migratory, and dispersal habitats for numerous organisms considered in this analysis (Appendix B), such habitats within the Proposed Sphere of Influence and within the City of Willits' proposed Land Use Change Areas also provide important hunting and foraging habitat for special status birds and bats that help to control rodent, insect, and other potential "pest" species populations, along with providing other important ecosystem services (e.g., scavenging, etc.).

Representative special status birds and/or otherwise protected raptors known from, or that have reasonable potential to utilize such habitats for sustenance within the Planning Area include White-tailed Kite (*Elanus leucurus*), Golden Eagle (*Aquila chrysaetos*), Red-tailed Hawk (*Buteo jamaicensis*), Red-shouldered Hawk (*Buteo lineatus*), Ferruginous Hawk (*Buteo regalis*), Northern Harrier (*Circus hudsonius*), Barn Owl (*Tyto alba*), Great-horned Owl (*Bubo virginianus*), Western Screech-Owl (*Megascops kennicottii*), Northern Pygmy-Owl (*Glaucidium gnoma*), Northern Saw-whet Owl (*Aegolius acadicus*), Turkey Vulture (*Cathartes aura*), Purple Martin (*Progne subis*), and Vaux's Swift (*Chaetura vauxi*). Potentially-affected special status bats species include the same five (5) species of bats addressed previously herein, which also potentially hunt for insects over grasslands and pastures within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas: Pallid Bat (*Antrozous pallidus*), Townsend's Big-eared Bat (*Corynorhinus townsendii*), Western Mastiff Bat (*Eumops perotis californicus*), Silver-haired Bat (*Lasionycteris noctivagans*), and Western Red Bat (*Lasiurus frantzii*).

Potential Impacts to Special Status Organisms Due to Increased Exposure to Potentially Lethal Pesticides

Potential indirect and/or cumulative significant adverse impacts to special status and/or otherwise protected organisms could also include increased mortality resulting from exposure to anticoagulant rodenticides, neonicotinoid insecticides, and other pesticides made more abundant by development allowed by the Project. Reasonably foreseeable examples include the direct exposure of special status pollinating insects to neonicotinoid pesticides and/or the indirect exposure of raptors or other scavengers through the consumption (and bioaccumulation) of contaminated food resources such as captured or scavenged rodents poisoned by anticoagulant rodenticides. Potentially-affected organisms identified in this analysis include the federal candidate species, Western Monarch butterfly (*Danaus plexippus plexippus*), the state candidate endangered Western Bumble Bee (*Bombus occidentalis*), Obscure Bumble Bee (*Bombus caliginosus*), federal and state threatened Northern Spotted Owl (*Strix occidentalis caurina*), California "fully protected" White-tailed Kite (*Elanus leucurus*), Turkey Vulture (*Cathartes aura*), Red-tailed Hawk (*Buteo jamaicensis*), Ferruginous Hawk (*Buteo regalis*), Northern Harrier (*Circus hudsonius*), Barn Owl (*Tyto alba*), Great-horned Owl (*Bubo virginianus*), Western Screech-Owl (*Megascops kennicottii*), Northern Saw-whet Owl (*Aegolius acadicus*), Northern Pygmy-Owl (*Glaucidium gnoma*); as well as mammalian predators and scavengers that consume carrion such as California species of special concern, Fisher (*Pekania pennanti*— Northern California/Southern Oregon DPS), Northern California Ringtail (*Bassariscus astutus raptor*) and American Badger (*Taxidea taxus*), etc.

Potential Impacts to Special Status Organisms Due to Increased Artificial Light Pollution

Potential indirect and/or cumulative significant adverse impacts to special status and/or otherwise protected organisms could also include disorientation and disruption of normal foraging/hunting,

reproduction, migratory, and other important nocturnal behaviors due to increased artificial light pollution resulting from anticipated increased development facilitated by the Project. Potential reasonably foreseeable examples include the abandonment of bat roosts by special status bats; disruptions to the foraging/hunting abilities of night-foraging special status birds and other nocturnal species; increases in mortality due to disorientation related to phototaxis (attraction and movement towards light); increases in mortality due to decreased ability to escape potential nocturnal predators; altered reproductive potentials due to artificial light-induced changes in nocturnal (and/or crepuscular) intraspecies interactions; as well as altered migratory patterns of juvenile salmonids, bird species, and other nocturnal migratory special status organisms.

Existing Regulatory Protections For Special Status and/or Otherwise Protected Fish, Wildlife, and/or Botanical Taxa

Existing regulations and policies would likely reduce some of the potential impacts identified herein to special status fish, wildlife, and/or botanical taxa. All development allowed by the Project would be subject to state and federal biological resource regulations and their associated respective permitting processes (see Regulatory Setting, previously herein), and would involve consultation with relevant regulatory agencies (e.g., CDFW, USFWS, NMFS, NCRWQCB, etc.) as appropriate. Included among such potential future development, any necessary augmentation of the City's surface water collection and storage infrastructure would involve consultation with the aforementioned regulatory agencies to maintain adequate instream flows in affected streams to avoid development-related dewatering events and associated impacts to dependent aquatic organisms.

Some existing goals, policies, implementation measures, and mitigation measures from the City's current Conservation and Open Space Element of the Willits General Plan Revision, Vision 2020 (1992); encourage the conservation and protection of public open space, natural resources, and the biological organisms they support within the Proposed Sphere of Influence and the City of Willits' proposed Land Use Change Areas (see Regulatory Setting, previously herein).

Additional proposed goals, policies, and implementation measures proposed in the current City of Willits General Plan Land Use Element Update, which would further encourage the protection of certain habitats within the Planning Area that support special status and/or otherwise protected organisms include the following:

> **Goal LU-9** To ensure that land use decisions protect and sustain important natural resources and limit exposure to hazards.
>
> **Policy LU-9.1 Riparian Buffer Areas —** Streams, wetlands, and their associated riparian habitats should be conserved in areas planned for development. Require project applicants located adjacent to streams to include appropriate measures for natural occurring stream channel and native riparian vegetation preservation, appropriate measures to stabilize stream banks, and prevent erosion and the discharge of sediment. (Source: New Policy and relates to Conservation and Open Space Policies in Section 3.200 and Mitigation Measures 4.731 and 4.733)
>
> **Policy LU-9.3 Riparian Area Land Use Overlay —** Apply an overlay to the Land Use Map, consistent with Conservation and Open Space Element Implementation Measure 3.320 identifying streams, known wetlands, and their associated riparian habitats within the City to be protected during development. Prohibit development within a buffer area sufficient

to protect resources that is established on either side of the stream and subject to the following criteria:

(a) A combining zone for stream and riparian areas shall also be established and applied to parcels adjacent to streams and subject to the Riparian Area Land Use Overlay that specifies protective criteria consistent with this policy.

(b) Buffers may be reduced or eliminated where the City determines, based on factual findings and in consultation with CDFW, that the reduction will not result in significant adverse effects to the water quality, dependent biological resources, or ecological functional capacity of the aquatic resource of interest.

(c) For ministerial projects that are located on land planned R-L, C-G, GM-U, DM-U containing occupied structures or on vacant parcels that are substantially surrounded by developed parcels where improvements are located within the buffer area, exceptions to these standards may be allowed after a site evaluation has been conducted by City staff and factual findings are made that development is sited to minimize potential impacts to streams, wetlands, and associated riparian resources; does not involve the removal of native riparian vegetation; and the incorporation of performance standards relating to the revegetation of locally-appropriate riparian species and the implementation of best management practices for erosion control.

(d) When the prescribed buffer prohibits development of the site for the primary use for which it is designated, measures shall be applied that allow development that results in the least environmentally damaging feasible project.

(e) Road, bridge, and trail construction or replacement may be permitted that would not result in significant adverse effects to water quality, dependent biological resources, or ecological functional capacity of the aquatic resource of interest, and where vegetative clearing is kept to a minimum and where revegetated with locally-appropriate native riparian species.

(f) The removal of vegetation for disease control or public safety purposes may be approved, in consultation with CDFW. (Source: New Policy)

(g) An exception to the implementing regulations for this policy shall be included for “minor additions” to buildings or structures provided the aggregated total increase in square footage for all changes does not exceed thee hundred (300) square feet of floor area.

Implementation Measures:

LU-9A Stream and Riparian Combining Zone — Amend the Zoning Regulations to establish a Stream and Riparian Combining Zone with standards consistent with the Conservation and Open Space Element and the Land Use Element to protect all streams, riparian areas, and wetlands from new ministerial and discretionary development. Amend the Zoning Map to apply the Stream and Riparian Combining Zone to notify the public that specific standards apply for all development within such areas.

Although the existing and proposed regulations and policies described above would likely reduce potential impacts to special status fish, wildlife, and/or botanical taxa identified herein, additional

mitigation would also be necessary to further reduce the likelihood for potential development-related impacts to protected biological organisms identified in this analysis to a level that would be less than significant. Such mitigation measures follow.

MITIGATION MEASURES

BIO-01.1. Utilize Biological Resource Inventory Assessment Tools During Project Review

New Policy for "Protect Natural Resources within Areas Planned for Development" Group:

Policy LU-9.X1 The City shall ensure that the best available biological resource mapping data is used during the ministerial and discretionary project review process to identify biological resource concerns, evaluate project alternatives, and guide mitigation to avoid or reduce biological resource impacts to insignificant levels consistent with CEQA. At a minimum, the following biological resource mapping data sources shall be used for project evaluation: California Department of Fish and Wildlife's California Natural Diversity Database (CNDDB) and their Biogeographic Information and Observation System (BIOS), EcoAtlas and the California Aquatic Resource Inventory (CARI), and U.S Fish and Wildlife Service's National Wetland Inventory (NWI).

BIO-01.2. Require Pre-Project Biological Resource Assessments and Surveys

New Policy for "Protect Natural Resources within Areas Planned for Development" Group:

Policy LU-9.X2 The City shall require site- and/or project-specific biological resource assessments: 1) prior to annexing any properties into the City from the Proposed Sphere of Influence additions, and 2) prior to approval of principally permitted development of multifamily housing on properties planned Residential-Medium Density in the South Haehl Creek area. Biological resource assessments shall address potential impacts to special status and/or otherwise protected fish, wildlife, and botanical taxa (including potential interferences with their movement, migration, and/or dispersal); sensitive natural communities; and wetland habitats. Biological resource assessments shall also identify mitigation measures to avoid and/or reduce impacts to protected biological resources to less than significant levels from all new development allowed within the study area by the General Plan.

Where biological resource assessments identify potentially suitable habitat for special status fish, wildlife, and/or botanical taxa; nesting bird or roosting bat habitat; sensitive natural communities; and/or wetlands or other state- or federally-regulated waters within respective study areas, appropriate pre-project biological surveys or habitat delineations shall also be required. All biological resource assessments, surveys, and delineations shall be performed in coordination with CDFW by qualified professionals with demonstrated familiarity and experience within the region and consistent with respective current field survey protocols.

BIO-01.3. Revise LU-9.3, Riparian Area Land Use Overlay, as follows to Define Riparian Buffer Area Metrics, Facilitate Landscape Permeability, Reduce Stormwater-Related Impacts, and Require Use of Appropriate Plant Species in Revegetation and Landscaping Efforts

Revise Policy LU-9.3, Riparian Area Land Use Overlay. Apply an overlay to the Land Use Map, consistent with Conservation and Open Space Element Implementation Measure 3.320 identifying streams and wetlands within the City to be protected from development. Prohibit development within a buffer area on both sides of streams subject to the following criteria:

(a) A combining zone for stream and riparian areas shall also be established and applied to parcels adjacent to streams and subject to the Riparian Area Land Use Overlay that specifies protective criteria consistent with this policy.

(b) Riparian Buffer Areas associated with streams shall be established on both sides of streams and shall be measured from either the outer drip-line of riparian vegetation or the top-of-bank, whichever is furthest from the stream centerline, and shall extend horizontally for a distance of:

- **100 feet for perennial streams, or**
- **50 feet for intermittent streams.**

Riparian Buffer Areas associated with wetlands shall extend horizontally from the delineated wetland boundary for a distance of:

- **150 feet for perennial wetlands, or**
- **50 feet for seasonal wetlands.**

(~~b~~**c**) Buffers may be reduced or eliminated where the City determines, based on factual findings and in consultation with CDFW, that the reduction will not result in significant adverse effects to the water quality, dependent biological resources, or ecological functional capacity of the aquatic resource of interest.

(~~c~~**d**) For ministerial projects that are located on land planned R-L, C-G, GM-U, DM-U containing occupied structures or on vacant parcels that are substantially surrounded by developed parcels where improvements are located within the buffer area, exceptions to these standards may be allowed after a site evaluation has been conducted by City staff and factual findings are made that development is sited to minimize potential impacts to streams, wetlands, and associated riparian resources; does not involve the removal of native riparian vegetation; and the incorporation of performance standards relating to the revegetation of locally-appropriate riparian species and the implementation of best management practices for erosion control.

(~~d~~**e**) When the prescribed buffer prohibits development of the site for the primary use for which it is designated, measures shall be applied that allow development that results in the least environmentally damaging feasible project.

(~~e~~**f**) Road, bridge, and trail construction or replacement may be permitted that would not result in significant adverse effects to water quality, dependent biological resources, or ecological functional capacity of the aquatic resource of interest, where vegetative clearing is kept to a minimum, and where revegetated with locally-appropriate native riparian species.

(g) **The installation or replacement of new or existing fencing contiguous with Riparian Buffer Areas shall require the use of wildlife-permeable materials and designs to reduce the likelihood of wildlife entrapment and otherwise facilitate wildlife movement.**

(h) All projects shall implement stormwater requirements from the Mendocino County Low Impact Development Standards Manual to protect water quality and associated aquatic habitats, avoid the use of noxious weeds or other invasive plants identified

by the California Invasive Plant Council (Cal-IPC) in associated revegetation and landscaping efforts, and prioritize use of locally-appropriate native vegetation during any such revegetation.

(~~f~~**i**) The removal of vegetation for disease control or public safety purposes may be approved, in consultation with CDFW.)

(~~g~~**j**) An exception to the implementation of regulations for this policy shall be included for "minor additions" to buildings or structures provided the aggregated total increase in square footage for all changes does not exceed thee hundred (300) square feet of floor area.

BIO-01.4. Require Low Impact Development (LID) Stormwater Design Standards and Use of Appropriate Plant Species in LID and Other Development-Related Landscaping and Revegetation Efforts

New Policy for "Protect Natural Resources within Areas Planned for Development" Group:

Policy LU-9.X3 To reduce stormwater impacts to streams and wetlands and improve water quality associated with discretionary development and all development within 250 feet of Willits, Broaddus or Baechtel Creeks and their tributaries, the City shall implement stormwater requirements from the Mendocino County Low Impact Development Standards Manual to attenuate runoff, reduce scouring and erosion, promote on-site infiltration, and to protect water quality and associated aquatic habitats.

New Policy for "Protect Natural Resources within Areas Planned for Development" Group:

Policy LU-9.X4 The City shall develop and make available a list of locally appropriate native vegetation suitable for planting within low impact development features and for development-related landscaping and revegetation. The City shall encourage the use of locally appropriate and locally sourced native vegetation for use in revegetation and landscaping efforts as well as encourage the planting of native milkweed (*Asclepias* spp.) species (i.e., the sole plant group within the Planning Area region suitable for egg laying and larval development for the federal candidate species, Western Monarch butterfly [*Danaus plexippus plexippus*]). Where rapid plant establishment and development is required for purposes of soil stabilization and to minimize erosion potential, the City shall encourage the use of sterile hybrid "wheatgrass" x "wheat" (*Elymus* x *Triticum*) or other similar non-reproductive seed material in conjunction with otherwise appropriately-selected revegetation seed applications or blends.

In all low impact development infrastructure and other development-related landscaping and revegetation, the City shall prohibit the use of any plant species designated as: "invasive" by the California Invasive Plant Council (Cal-IPC), a "noxious weed" by the California Department of Food & Agriculture (CDFA), or a "federal noxious weed" by the U.S. Department of Agriculture (USDA), as well as any other plants that the City has determined warrant concern based on a known potential for preventing the establishment of the intended vegetation assemblage within respective revegetation areas.

BIO-01.5. Require Appropriate Design Standards to Minimize Artificial Light Pollution

New Policy for "Protect Natural Resources within Areas Planned for Development" Group:

Policy LU-9.X5 The design and location of all outdoor lighting fixtures shall prevent direct illumination of streams, wetlands, and Riparian Buffer Areas.

BIO-01.6. Initiate Community Outreach to Reduce Impacts to Wildlife from Pesticide-Related Poisonings and Free-Ranging House Cats.

New Policy for "Protect Natural Resources within Areas Planned for Development" Group:

Policy LU-9.X6 Partner with local organizations to educate applicants and residents about the impacts to special status and otherwise protected wildlife from toxic pest control methods, and to discourage their use within the City; as well as to educate the community about the impacts of free-ranging house cats on special status and otherwise protected wildlife.

SIGNIFICANCE AFTER MITIGATION

Adoption and implementation of the aforementioned mitigation measures would reduce the impact of potential development-related effects allowed by the Project to special status and/or otherwise protected biological organisms to a level that would be less than significant.

Impact BIO-02: Potentially Significant Impacts to Riparian Habitats and/or Other Sensitive Natural Communities

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Development facilitated by the Project does have the potential to result in direct, indirect, and/or cumulative adverse impacts to riparian habitats associated with the various tributary streams of the Outlet Creek watershed and other sensitive natural communities (e.g., *Quercus lobata* Woodland Alliance [Valley Oak Woodland and Forest], etc.) within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas (Table 3.4d). Development allowed by the Project could potentially result in the direct conversion, loss, reduction, and/or substantial degradation of such habitats. Subsequent, incremental modifications of vegetation, hydrologic, edaphic, microclimatic, and/or other environmental conditions could, individually or in aggregate, reduce and/or degrade habitats within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas to the extent that such events result in the impairment of beneficial ecological functions associated with such sensitive natural habitats. The aforementioned impacts would be considered significant without sufficient mitigation.

EXISTING REGULATORY PROTECTIONS FOR RIPARIAN HABITATS AND/OR OTHER SENSITIVE NATURAL COMMUNITIES

Existing regulations and policies would likely reduce some of the potential development-related impacts identified herein to riparian habitats and/or other sensitive natural communities identified in this analysis. All development resulting from, or otherwise facilitated by, the Project would be subject to existing state and federal natural resource regulations and their associated respective permitting processes (see Regulatory Setting, previously herein), and would involve consultation with relevant regulatory agencies (e.g., CDFW, USFWS, NMFS, USACE, NCRWQCB, etc.) as appropriate.

Some existing goals, policies, implementation measures, and mitigation measures from the City's Conservation and Open Space Element of the Willits General Plan Revision, Vision 2020 (1992); also encourage the conservation and protection of public open space, natural resources, and the biological organisms they support within the Proposed Sphere of Influence and the City of Willits' proposed Land Use Change Areas (see Regulatory Setting, previously herein).

Additional proposed goals, policies, and implementation measures proposed in the current City of Willits General Plan Land Use Element Update, which would further protect riparian habitats and/or other sensitive natural communities include the following:

> **Goal LU-9** To ensure that land use decisions protect and sustain important natural resources and limit exposure to hazards.

Policy LU-9.1 Riparian Buffer Areas — Streams, wetlands, and their associated riparian habitats should be conserved in areas planned for development. Require project applicants located adjacent to streams to include appropriate measures for natural occurring stream channel and native riparian vegetation preservation, appropriate measures to stabilize stream banks, and prevent erosion and the discharge of sediment. (Source: New Policy and relates to Conservation and Open Space Policies in Section 3.200 and Mitigation Measures 4.731 and 4.733)

Policy LU-9.2 Not Net Loss of Wetlands Resulting from Development — To ensure that no net loss of wetlands result from development consistent with Conservation and Open Space Mitigation 4.736, the presence of potential wetlands in the vicinity of a proposed project shall be determined during the review process for discretionary projects and for ministerial building and grading permit applications, when the proposed building development activity involves new construction or expansion of existing structures or grading activities. Wetland delineation by a qualified professional shall be required when wetland characterization and limits cannot be easily determined based on available information or identified during a pre-site inspection. (Source: New Policy)

Policy LU-9.3 Riparian Area Land Use Overlay — Apply an overlay to the Land Use Map, consistent with Conservation and Open Space Element Implementation Measure 3.320 identifying streams, known wetlands, and their associated riparian habitats within the City to be protected during development. Prohibit development within a buffer area sufficient to protect resources that is established on either side of the stream and subject to the following criteria:

(a) A combining zone for stream and riparian areas shall also be established and applied to parcels adjacent to streams and subject to the Riparian Area Land Use Overlay that specifies protective criteria consistent with this policy.

(b) Buffers may be reduced or eliminated where the City determines, based on factual findings and in consultation with CDFW, that the reduction will not result in significant adverse effects to the water quality, dependent biological resources, or ecological functional capacity of the aquatic resource of interest.

(c) For ministerial projects that are located on land planned R-L, C-G, GM-U, DM-U containing occupied structures or on vacant parcels that are substantially surrounded by developed parcels where improvements are located within the buffer area, exceptions to these standards may be allowed after a site evaluation has been conducted by City staff and factual findings are made that development is sited to minimize potential impacts to streams, wetlands, and associated riparian resources; does not involve the removal of native riparian vegetation; and the incorporation of performance standards relating to the revegetation of locally-appropriate riparian species and the implementation of best management practices for erosion control.

(d) When the prescribed buffer prohibits development of the site for the primary use for which it is designated, measures shall be applied that allow development that results in the least environmentally damaging feasible project.

(e) Road, bridge, and trail construction or replacement may be permitted that would not result in significant adverse effects to water quality, dependent biological resources,

or ecological functional capacity of the aquatic resource of interest, and where vegetative clearing is kept to a minimum and where revegetated with locally-appropriate native riparian species.

(f) The removal of vegetation for disease control or public safety purposes may be approved, in consultation with CDFW. (Source: New Policy)

(g) An exception to the implementing regulations for this policy shall be included for "minor additions" to buildings or structures provided the aggregated total increase in square footage for all changes does not exceed thee hundred (300) square feet of floor area.

Policy LU-9.4 Protect Oak Trees and Woodlands — Integrate important tree protections from the Urban Forest Management Plan into the Zoning Regulations and establish an oak tree and oak woodland retention and protection program for new development that emphasizes the avoidance, minimization, or mitigation of oak tree and oak woodlands removal. (Source: New Policy)

Implementation Measures:

LU-9A Stream and Riparian Combining Zone. Amend the Zoning Regulations to establish a Stream and Riparian Combining Zone with standards consistent with the Conservation and Open Space Element and the Land Use Element to protect all streams, riparian areas, and wetlands from new ministerial and discretionary development. Amend the Zoning Map to apply the Stream and Riparian Combining Zone to notify the public that specific standards apply for all development within such areas.

LU-9B Oak Tree Protections. Consistent with Urban Forest Management Plan, adopt Zoning Standards to protect oak trees as part of new ministerial and discretionary development.

Although the existing and proposed regulations and policies described above would likely reduce potential impacts to riparian habitats and sensitive natural communities identified in this analysis, additional mitigation would be necessary to further reduce the likelihood for potential development-related impacts to such habitats to a level that would be less than significant. Such mitigation measures follow.

MITIGATION MEASURES

BIO-02.1. Utilize Biological Resource Inventory Assessment Tools During Project Review

Refer to Mitigation Measure BIO-01.1.

BIO-02.2. Require Pre-Project Biological Resource Assessments and Surveys

Refer to Mitigation Measure BIO-01.2.

BIO-02.3. Revise LU-9.3, Riparian Area Land Use Overlay, to Define Riparian Buffer Area Metrics, Facilitate Landscape Permeability, Reduce Stormwater-Related Impacts, and Require Use of Appropriate Plant Species in Revegetation and Landscaping Efforts

Refer to Mitigation Measure BIO-01.3.

BIO-02.4. Require Low Impact Development (LID) Stormwater Design Standards and Use of Appropriate Plant Species in LID and Other Development-Related Landscaping and Revegetation Efforts

Refer to Mitigation Measure BIO-01.4.

SIGNIFICANCE AFTER MITIGATION

Adoption and implementation of the aforementioned mitigation measures would reduce the impact of potential development-related effects allowed by the Project to riparian habitats and other sensitive natural communities to a level that would be less than significant.

Impact BIO-03: Potentially Significant Impacts to State- and/or Federally-Regulated Wetlands and/or Waters

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Development facilitated by the Project does have the potential to result in direct, indirect, and/or cumulative adverse impacts to state- and/or federally-regulated wetlands and/or waters within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas. These aquatic resources include riverine wetlands and waters associated with the various tributary streams of the Outlet Creek watershed, lacustrine waters of Morris and Centennial Reservoirs, palustrine wetlands and ponds that may be present within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas (Figure 2-1), and potentially other as-of-yet unidentified wetlands within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas as well.

Development allowed by the Project could potentially result in the direct fill, conversion, loss, reduction, and/or substantial degradation of such wetland habitats, and subsequent incremental modifications of associated vegetation, hydrologic, edaphic, microclimatic, and/or other environmental conditions could also, individually or in aggregate, reduce and/or degrade wetland habitats within the Proposed Sphere of Influence and/or within the City of Willits' proposed Land Use Change Areas to the extent that such events result in the impairment of beneficial ecological functions. The aforementioned impacts would be considered significant without sufficient mitigation.

EXISTING REGULATORY PROTECTIONS FOR STATE- AND/OR FEDERALLY-REGULATED WETLANDS AND/OR WATERS

Existing regulations and policies would likely reduce some potential impacts to wetlands, Waters of the State, and/or Waters of the U.S. identified above. All development facilitated by the Project would be subject to existing state and federal aquatic resource regulations (see Regulatory Setting, previously herein) and their associated respective permitting processes, and would require consultation with the U.S. Army Corps of Engineers (USACE), the North Coast Regional Water Quality Control Board (NCRWQCB), and/or California Department of Fish and Wildlife (CDFW).

Some existing goals, policies, implementation measures, and mitigation measures from the City's Conservation and Open Space Element of the Willits General Plan Revision, Vision 2020 (1992) encourage the conservation and protection of wetlands and waters within the Proposed Sphere of Influence Area and/or within the City of Willits' proposed Land Use Change Areas (see Regulatory Setting previously herein), including Mitigation Measure 4.736, which specifies that the City shall require "no net loss of wetlands" in the review of proposed development projects.

Additional proposed goals, policies, and implementation measures proposed in the current City of Willits General Plan Land Use Element Update, which are intended to protect wetland habitats and waters within the Planning Area include the following:

> **Goal LU-9** To ensure that land use decisions protect and sustain important natural resources and limit exposure to hazards.

Policy LU-9.1 Riparian Buffer Areas — Streams, wetlands, and their associated riparian habitats should be conserved in areas planned for development. Require project applicants located adjacent to streams to include appropriate measures for natural occurring stream channel and native riparian vegetation preservation, appropriate measures to stabilize stream banks, and prevent erosion and the discharge of sediment. (Source: New Policy and relates to Conservation and Open Space Policies in Section 3.200 and Mitigation Measures 4.731 and 4.733)

Policy LU-9.2 Not Net Loss of Wetlands Resulting from Development — To ensure that no net loss of wetlands result from development consistent with Conservation and Open Space Mitigation 4.736, the presence of potential wetlands in the vicinity of a proposed project shall be determined during the review process for discretionary projects and for ministerial building and grading permit applications, when the proposed building development activity involves new construction or expansion of existing structures or grading activities. Wetland delineation by a qualified professional shall be required when wetland characterization and limits cannot be easily determined based on available information or identified during a pre-site inspection. (Source: New Policy)

Policy LU-9.3 Riparian Area Land Use Overlay — Apply an overlay to the Land Use Map, consistent with Conservation and Open Space Element Implementation Measure 3.320 identifying streams, known wetlands, and their associated riparian habitats within the City to be protected during development. Prohibit development within a buffer area sufficient to protect resources that is established on either side of the stream and subject to the following criteria:

(a) A combining zone for stream and riparian areas shall also be established and applied to parcels adjacent to streams and subject to the Riparian Area Land Use Overlay that specifies protective criteria consistent with this policy.

(b) Buffers may be reduced or eliminated where the City determines, based on factual findings and in consultation with CDFW, that the reduction will not result in significant adverse effects to the water quality, dependent biological resources, or ecological functional capacity of the aquatic resource of interest.

(c) For ministerial projects that are located on land planned R-L, C-G, GM-U, DM-U containing occupied structures or on vacant parcels that are substantially surrounded by developed parcels where improvements are located within the buffer area, exceptions to these standards may be allowed after a site evaluation has been conducted by City staff and factual findings are made that development is sited to minimize potential impacts to streams, wetlands, and associated riparian resources; does not involve the removal of native riparian vegetation; and the incorporation of performance standards relating to the revegetation of locally-appropriate riparian species and the implementation of best management practices for erosion control.

(d) When the prescribed buffer prohibits development of the site for the primary use for which it is designated, measures shall be applied that allow development that results in the least environmentally damaging feasible project.

(e) Road, bridge, and trail construction or replacement may be permitted that would not result in significant adverse effects to water quality, dependent biological resources,

or ecological functional capacity of the aquatic resource of interest, and where vegetative clearing is kept to a minimum and where revegetated with locally-appropriate native riparian species.

(f) The removal of vegetation for disease control or public safety purposes may be approved, in consultation with CDFW. (Source: New Policy)

(g) An exception to the implementing regulations for this policy shall be included for "minor additions" to buildings or structures provided the aggregated total increase in square footage for all changes does not exceed thee hundred (300) square feet of floor area.

Implementation Measures:

LU-9A Stream and Riparian Combining Zone — Amend the Zoning Regulations to establish a Stream and Riparian Combining Zone with standards consistent with the Conservation and Open Space Element and the Land Use Element to protect all streams, riparian areas, and wetlands from new ministerial and discretionary development. Amend the Zoning Map to apply the Stream and Riparian Combining Zone to notify the public that specific standards apply for all development within such areas.

Although the existing and proposed regulations and policies described above would likely reduce potential impacts to state- and/or federally-regulated wetlands and/or waters, additional mitigation would be necessary to further reduce the likelihood for potential development-related impacts to such aquatic resources to a level that would be less than significant. Such mitigation measures follow.

Mitigation Measures

BIO-03.1. Utilize Biological Resource Inventory Assessment Tools During Project Review

Refer to Mitigation Measure BIO-01.1.

BIO-03.2. Require Pre-Project Biological Resource Assessments and Surveys

Refer to Mitigation Measure BIO-01.2.

BIO-03.3. Revise LU-9.3, Riparian Area Land Use Overlay, to Define Riparian Buffer Area Metrics, Facilitate Landscape Permeability, Reduce Stormwater-Related Impacts, and Require Use of Appropriate Plant Species in Revegetation and Landscaping Efforts

Refer to Mitigation Measure BIO-01.3.

BIO-03.4. Require Low Impact Development (LID) Stormwater Design Standards and Use of Appropriate Plant Species in LID and Other Development-Related Landscaping and Revegetation Efforts

Refer to Mitigation Measure BIO-01.4.

Significance After Mitigation

Adoption and implementation of the aforementioned mitigation measures would reduce the impact of potential development-related effects allowed by the Project to state- and/or federally-regulated wetlands and/or waters to a level that would be less than significant.

Impact BIO-04: Potential Interference in the Movement or Migration of Native Wildlife and/or their Use of Native Wildlife Nursery Sites

Development consistent with the Project does have the potential to interfere with the movements and migration of native wildlife within the proposed expanded Sphere of Influence, and to a lesser extent, within the existing incorporated City limits. The conversion of existing undeveloped natural habitats to developed landscapes with associated road systems, fencing, and other such infrastructure would likely fragment and reduce the extent of native habitats within the Proposed Sphere of Influence Area and/or within the City of Willits' proposed Land Use Change Areas that currently provide for wildlife movement, migration, and dispersal. Expected increases in artificial night lighting and human–wildlife interactions resulting from anticipated development would also likely contribute to increased disorientation, disruptions, and interference with native wildlife movements and migration.

Additionally, the installation of streamflow conveyance structures (e.g., culverts, bridges, etc.); utility services infrastructure (e.g.; water, sewer, and/or electrical pipelines; etc.); and/or other new development allowed by the Project that encroach on stream channels within the Proposed Sphere of Influence Area and/or within the City of Willits' proposed Land Use Change Areas could create new passage barriers to special status anadromous fish and/or other aquatic organisms within affected stream channels. Such passage barriers could isolate protected aquatic organisms from critical spawning, breeding, rearing, foraging, and/or refugia habitat necessary for completion of their respective life cycles. Potential interferences with the movements or migration of native wildlife would be considered significant.

Existing Regulatory Protections To Minimize Potential Interference in the Movement or Migration of Native Wildlife and/or Their Use of Native Wildlife Nursery Sites

Existing regulations and policies would likely reduce some potential effects on the movement or migration of native wildlife and/or their use of native wildlife nursery sites identified above. All development allowed by the Project would be subject to existing state and federal natural resource regulations (see Regulatory Setting, previously herein) and their associated respective permitting processes, including CDFW's Lake and Streambed Alteration Program, and would require consultation with CDFW and other relevant regulatory agencies (e.g., USFWS, NMFS, USACE, NCRWQCB, etc.) as appropriate.

Some existing goals, policies, implementation measures, and mitigation measures from the City's current Conservation and Open Space Element of the Willits General Plan Revision, Vision 2020 (1992); encourage the conservation and protection of public open space, natural resources, and the biological organisms they support within the incorporated City limits and the proposed expanded Sphere of Influence (see Regulatory Setting previously herein), including Implementation Measure 3.320, which specifies that applications for development within 250 feet of Willits, Broaddus, or Baechtel Creeks include site-specific field observation by qualified biological resource specialists as part of the application package.

Additional proposed goals, policies, and implementation measures proposed in the current City of Willits General Plan Land Use Element Update intended to protect riparian habitats within the Planning Area would also likely reduce development-related impacts to such habitats, thereby reducing potential interference in the movements and migration of native wildlife associated with riparian corridors resulting from development allowed by the Project. Such goals, policies, and implementation measures include:

Goal LU-9 To ensure that land use decisions protect and sustain important natural resources and limit exposure to hazards.

Policy LU-9.1 Riparian Buffer Areas — Streams, wetlands, and their associated riparian habitats should be conserved in areas planned for development. Require project applicants located adjacent to streams to include appropriate measures for natural occurring stream channel and native riparian vegetation preservation, appropriate measures to stabilize stream banks, and prevent erosion and the discharge of sediment. (Source: New Policy and relates to Conservation and Open Space Policies in Section 3.200 and Mitigation Measures 4.731 and 4.733)

Policy LU-9.3 Riparian Area Land Use Overlay — Apply an overlay to the Land Use Map, consistent with Conservation and Open Space Element Implementation Measure 3.320 identifying streams, known wetlands, and their associated riparian habitats within the City to be protected during development. Prohibit development within a buffer area sufficient to protect resources that is established on either side of the stream and subject to the following criteria:

(a) A combining zone for stream and riparian areas shall also be established and applied to parcels adjacent to streams and subject to the Riparian Area Land Use Overlay that specifies protective criteria consistent with this policy.

(b) Buffers may be reduced or eliminated where the City determines, based on factual findings and in consultation with CDFW, that the reduction will not result in significant adverse effects to the water quality, dependent biological resources, or ecological functional capacity of the aquatic resource of interest.

(c) For ministerial projects that are located on land planned R-L, C-G, GM-U, DM-U containing occupied structures or on vacant parcels that are substantially surrounded by developed parcels where improvements are located within the buffer area, exceptions to these standards may be allowed after a site evaluation has been conducted by City staff and factual findings are made that development is sited to minimize potential impacts to streams, wetlands, and associated riparian resources; does not involve the removal of native riparian vegetation; and the incorporation of performance standards relating to the revegetation of locally-appropriate riparian species and the implementation of best management practices for erosion control.

(d) When the prescribed buffer prohibits development of the site for the primary use for which it is designated, measures shall be applied that allow development that results in the least environmentally damaging feasible project.

(e) Road, bridge, and trail construction or replacement may be permitted that would not result in significant adverse effects to water quality, dependent biological resources, or ecological functional capacity of the aquatic resource of interest, and where vegetative clearing is kept to a minimum and where revegetated with locally-appropriate native riparian species.

(f) The removal of vegetation for disease control or public safety purposes may be approved, in consultation with CDFW. (Source: New Policy)

(g) An exception to the implementing regulations for this policy shall be included for "minor additions" to buildings or structures provided the aggregated total increase in square footage for all changes does not exceed thee hundred (300) square feet of floor area.

Implementation Measures:

LU-9A Stream and Riparian Combining Zone — Amend the Zoning Regulations to establish a Stream and Riparian Combining Zone with standards consistent with the Conservation and Open Space Element and the Land Use Element to protect all streams, riparian areas, and wetlands from new ministerial and discretionary development. Amend the Zoning Map to apply the Stream and Riparian Combining Zone to notify the public that specific standards apply for all development within such areas.

Although the existing and proposed regulations and policies described above would likely reduce potential development-related interferences in the movement or migration of native wildlife and/or their use of native wildlife nursery sites, additional mitigation would be necessary to further reduce or potential development-related impacts to a level that would be less than significant. Such mitigation measures follow.

Mitigation Measures

BIO-04.1. Revise LU-9.3, Riparian Area Land Use Overlay, to Define Riparian Buffer Area Metrics, Facilitate Landscape Permeability, Reduce Stormwater-Related Impacts, and Require Use of Appropriate Plant Species in Revegetation and Landscaping Efforts

Refer to Mitigation Measure BIO-01.3.

BIO-04.2. Require Appropriate Design Standards to Minimize Artificial Light Pollution

Refer to Mitigation Measure BIO-01.5.

Significance After Mitigation

Adoption and implementation of the aforementioned mitigation measures would reduce the impact of potential development-related effects allowed by the Project on the movement and migration of native wildlife, and/or their use of native wildlife nursery sites to a level that would be less than significant.

Impact BIO-05: Potential Conflict with Local Policies or Ordinances Protecting Biological Resources

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The proposed Project is an update to the City of Willits' Land Use Element policy, Land Use Maps, and planning related to proposed land use changes within the City and the proposed expansion of the City's Sphere of Influence to expand land supply available for residential and employment-related development. Until annexation of the Proposed Sphere of Influence Areas occurs, the Resource Management Element of the Mendocino County General Plan is applicable to any proposed development and Mendocino County is the development project approval authority for any such proposed development.

The proposed City of Willits General Plan Land Use Element Update includes new policies to provide coordinated interim planning for Sphere of Influence Areas prior to potential annexations and to ensure that any interim development within the Proposed Sphere of Influence Area does not conflict with the

City of Willits General Plan. Proposed Policy LU-1.1, Planning Area, requests that applications for development or changes in organization within the Planning Area be referred to the City for review and comment and encourages the County to implement measures to protect areas within the Planning Area not planned for development, including the City watersheds and groundwater recharge areas. Proposed Policy LU-1.3, County General Plan Land Use within Sphere of Influence, seeks agreement with Mendocino County on appropriate interim land use designations and zoning classifications for Proposed Sphere of Influence areas, to ensure that any development prior to annexation is consistent with the City of Willits General Plan and does not prevent attainment of planned densities. Proposed Policy LU-9.5, Preserve Agricultural Lands, directs the City to discourage urban development on unincorporated land within its Proposed Sphere of Influence until annexed by the City and supports County land use regulations that protect the viability of local agriculture in the Little Lake Valley.

Implementation of proposed Project, which includes new and revised goals and policies that would direct the coordination of land use within the Proposed Sphere of Influence Area with Mendocino County, also includes the addition of a new policy group in the Land Use Element referred to as "Protect Natural Resources within Areas Planned for Development." Policies within this grouping are intended to refine, enhance, and further implement the policies of the City General Plan's Conservation and Open Space Element, especially as they relate to development near riparian areas, wetlands, and sensitive natural communities such as oak woodlands. As detailed previously herein, such new policies, coupled with mitigations measures specified above, require thorough biological resource evaluation during the project review process, require protection of riparian habitats and the establishment of clearly-defined riparian buffer areas, result in no net loss of wetlands, and require the establishment of important tree protections from the City's Urban Forest Management Plan (2022) into the Zoning Regulations. Implementation of the proposed Project would be consistent with, or improve upon, local policies and ordinances protecting biological resources and would therefore not conflict with Local Policies or Ordinances Protecting Biological Resources.

MITIGATION MEASURES

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Impact BIO-06: Potential Conflict with Adopted Habitat Conservation Plans, Natural Community Conservation Plans, and/or Other Approved Local, Regional, or State Habitat Conservation Plan

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There are no adopted habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans within the Planning Area. Therefore, implementation of the proposed Project would not conflict with any known conservation plans and no mitigation measures would be required.

MITIGATION MEASURES

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

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3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

This section describes the potential impacts to cultural and tribal cultural resources (TCR) associated with the proposed Project. This section also describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential cultural and TCR impacts, and identifies policies and/or mitigation measures that could minimize potentially significant impacts.

ENVIRONMENTAL SETTING

The following Environmental Setting is largely based upon the background information provided in the 2040 Ukiah General Plan Draft EIR (2022):

Cultural resources include archaeological resources and historical resources and TCR are resources of significance to California Native American tribes. These terms are further defined as follows:

- **Archaeological resources** are sites, subsurface human cultural remains older than 50 years and evaluated in terms of the general historic period from which they came: prehistoric (12,000 to 1541 years ago) and historic (1542 to 50 years ago). A site holds value for significant events, occupations, or cultural value, regardless of existing structures.

- **Tribal cultural resources (TCR)** are sites, features, landscapes, sacred places, or objects of value to California Native American tribes. This covers nonunique archaeological resources or those deemed tribal cultural resources by the lead agency (AB 52 and Tribal Cultural Resources in CEQA 2017).

The history of Mendocino County, of which Willits is a part, can be understood through consideration of the Precontact Setting, Ethnographic Background, and Historic Setting. Brief summaries of each of these topics is provided below.

Precontact Setting

For Northwest California, a four-period chronology was established for understanding the precontact setting: Pleistocene-Holocene transition (11,500 to 8,000 B.C.), Early Holocene (8,000 to 5,000 B.C.), Middle Holocene (5,000 to 2,000 B.C.), and Late Holocene (Post 2,000 B.C.). Cultural patterns were found to align with these periods.

Pleistocene-Holocene Transition (ca. 11,500 to 8,000 B.C.)

Information on the Northwest region during this time is limited. It aligns with the "Post Pattern," a cultural trend. Artifacts like flaked stone crescents and fluted projectile points characterize this pattern. Significant sites in Northwest California include Clear Lake, Cache Creek, Mendocino County, and Bodega Head,.

Early Holocene (8,000 to 5,000 B.C.)

In Northwest California's Early Holocene period, the Borax Lake Pattern is a recognized cultural plan depicting skilled foragers who moved seasonally for resources. It features wide-stemmed projectile points, flake tools, and milling equipment. The Borax Lake Pattern is mainly inland, but a resource identified by HUM-513/H, near the coast, is linked to it as a hunting camp for elk.

Around 6,500 B.C., the Berkeley Pattern emerged near Clear Lake, highlighting stable settlements, ceremonial burials, acorn processing with pestles, and distinct living and burial areas.

Middle Holocene (5,000 to 2,000 B.C.)

In Northwest California's Middle Holocene period, gaps exist in the archaeological record, notably in the early phase. North of Cape Mendocino, human presence lacks documentation until after 3,000 B.C.,

coinciding with the Mendocino Pattern. This cultural trend features diverse artifacts like projectile points, handstones, milling-slabs, and flake tools. Mendocino Pattern sites mainly served as transient camps or seasonal residences for resource gathering.

Late Holocene (Post 2,000 B.C.)

In Northwest California's Late Holocene period, the Mendocino Pattern shifts after A.D. 500, staying within Central Mendocino. Two new patterns emerge: Gunther Pattern in the north and Augustine Pattern in the south. The Gunther Pattern spans Sonoma-Mendocino to California-Oregon, with defined sites and polished tools. South of Sonoma-Mendocino, the Augustine Pattern varies. Some sites were found to be seasonal, while others like the Berkeley Pattern, were found to be year-round. The Augustine Period includes beads, Haliotis ornaments, and cremation.

Ethnographic Background

Around Euroamerican contact (circa 1769), Mendocino County housed diverse indigenous groups: Central Pomo, Northern Pomo, Coast Yuki, Yuki, Huchnom, Cahto, Sinkyone, and Wailaki. Central and Northern Pomo mainly inhabited the county, while other groups settled nearer its north. These tribes had similar material cultures, emphasizing basketry for essential tasks. However, each group had distinct territories, practices, and societal norms.

Pomo

In Mendocino County, Central Pomo were in the south, Northern Pomo in the north. Northern Pomo controlled the coast to Clear Lake, including tribes like Coyote, Yokayo, Redwood, and Potter Valley. The Pomo had diverse social structures, used baskets for fishing and ceremonies, and traded with neighbors. Conflicts arose over expansion and resources.

Coast Yuki, Yuki, and Huchnom

Coast Yuki occupied Fort Bragg to Rockport (Miller 1978), adapting to coastal life due to limited inland resources. Yuki and Huchnom were east in upper Eel River, past Round Valley and south of Willits (Miller 1978; Ukiah 2040 General Plan Update 2022). With scarce records and smaller populations than Pomo, they united in 1860s at Round Valley Reservation (Miller 1978), Mendocino's largest Indian land, established in 1858.

Cahto

Cahto's land includes Branscomb, Laytonville, Cummings, and valleys along South Fork Eel River, slightly beyond the Mendocino County border. There is limited ethnographic data on Cahto, as they were a smaller group than the Pomo. By 1920s, most Cahto moved to Round Valley or a tribal rancheria near Laytonville.

Historic Setting

Spanish Period (1769 – 1822)

From 1542, Spanish explored California without settlements. In 1769, Spain claimed Alta California and in the 18th century, Spain built presidios, missions, and towns to convert natives and settle Spaniards. In 1823, the closest mission to Willits was founded, Mission San Francisco Solano in Sonoma (California Missions 2023). Alta California later became New Spain's colony.

Mexican Period (1822 – 1848)

In California's Mexican era (circa 1821-1848), missions secularized, ranchos formed, and Native Americans labored. Land grants shaped counties, including Mendocino, in the 1840s. No towns existed until 1859, and administration was under Sonoma County due to the low population of Mendocino County.

The Bear Flag Revolt in 1846 showed U.S. settlers' concerns about Mexican rule. The U.S./Mexico conflict in 1846 and the Treaty of Guadalupe Hidalgo in 1848 marked the beginning of California's American Period.

American Period (1848 – Present)

Statehood followed through the Compromise of 1850, designating territories. Horticulture, livestock, and cattle-based economy continued. The Gold Rush in 1848 shifted cattle's value. Severe drought in the 1860s hurt cattle herds and rancheros' income. Property boundary issues caused conflicts. Debt and legal costs led to rancho lands transfer to Americans, often converting to plots or towns.

Local History

Within Little Lake Valley, the City of Willits (City) is surrounded by a secondary forest teeming with tan oak, madrone, Douglas fir, and redwood trees. This landscape resides within the Pacific Coast Range, earning the City the monikers "Gateway to the Redwoods" and the "Heart of Mendocino County." Notably, the region was originally inhabited by the Pomo tribe of Native Americans, who enjoyed a deep-rooted connection with the land. Their presence echoes through time, enriching the City's heritage. Several prehistoric sites have been noted in the vicinity of Willits and the ethnographic village of Mitoma is reported to be in the southwestern part of the City. Prehistoric cultural resources are most likely to be found at the base of hills and along seasonal and perennial water courses. These areas have been identified as potentially sensitive on the Historical and Archaeological Resources Map located in the City of Willits General Plan (1992). This Map is attached in Appendix C.

Previously Identified Cultural Resources

A review of the National Register of Historic Places (NRHP) and the California Register or Historical Resources (CRHR) shows that the City contains four (4) historic properties listed on the NRHP (2023): Skunk Train “Willits” Depot; Willits Carnegie Library; Babcock, Dr. Raymond, House; and Larsen Family House, all of which lie in or near downtown Willits. Resources listed on the NRHP are automatically listed on the CRHR, and no additional resources are listed on the CRHR.

REGULATORY SETTING

Cultural assets, encompassing both constructed structures and archaeological sites, might receive recognition of their significance from National, State, or local governing bodies. For a resource to be eligible for inclusion in the NRHP and the CRHR, it must satisfy one or more established criteria of importance (described further below). Furthermore, the resource needs to maintain an appropriate level of historical integrity, a concept described in *National Register Bulletin 15* as the resource's "capacity to communicate its significance" (National Park Service [NPS] 1990).

FEDERAL

National Historic Preservation Act (of 1966 (54 U.S.C. 300101 et seq., formerly 16 U.S.C. 470 et seq.) (NHPA)

This law was enacted to prevent unnecessary harm to historic properties. The NHPA includes regulations that apply specifically to federal land-holding agencies, but also includes regulations ("Section 106"; 54 U.S.C. 306108) that pertain to all projects funded, permitted, or approved by any federal agency that have the potential to affect cultural resources. Provisions of the NHPA establish a National Register of Historic Places (NRHP); the Advisory Council on Historic Preservation; State Historic Preservation Offices; and federal grants-in-aid programs. Section 306108 indicates that the leader of any Federal entity that holds immediate or indirect authority over a planned Federal project or one that receives Federal assistance within any state, along with the leader of any Federal department or autonomous agency empowered to grant licenses for such projects, must consider the impact of the project on any historical

property. This evaluation should be carried out before endorsing the utilization of Federal funds for the project or before granting any licenses. The Federal agency's leader is also required to provide the Council a fair chance to provide input concerning the project (NPS 1990).

National Environmental Policy Act of 1969 (42 U.S.C. 4321 and 4331-4335, as amended) (NEPA)

The act establishes guidelines to "preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choice." All projects that are subject to NEPA are subject to compliance with Section 106 of the NHPA (54 U.S.C. 306108) and NEPA requirements concerning cultural resources.

American Indian Religious Freedom Act of 1978 (42 U.S.C. 1996 and 1996a, as amended) and Native American Graves and Repatriation Act of 1990 (25 U.S.C. 3001 et seq., as amended)

These acts establish as national policy that traditional religious practices and beliefs, sacred sites (including right of access), and the use of sacred objects shall be protected and preserved. Native American remains are further protected by the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990.

Secretary of the Interior's Standards

The Secretary of the Interior is responsible for establishing professional standards and providing guidance related to the preservation and protection of all cultural resources listed in, or eligible for listing in, the National Register of Historic Places. The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings and the Secretary of the Interior's Guidelines for Rehabilitating Historic Buildings and the Guidelines on Sustainability for Rehabilitating Historic Buildings apply to all grants-in-aid projects assisted through the Historic Preservation Fund, and are intended to be applied to a wide variety of historic preservation and community projects and resources focused on heritage preservation, including buildings, structures, sites, objects, and districts.

National Register of Historic Places (NRHP)

Archaeological and historical sites can be given a measure of protection if they are eligible for the NRHP. The criterion most often applied to archaeological sites addresses the potential of a site to yield information important in prehistory or history. The NRHP criteria, and other information issued by the Advisory Council on Historic Preservation, present the legal measures of significance relevant to cultural resources. The NRHP criteria are the following:

- The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects of State and local importance that posses integrity of location, design, setting, materials, workmanship, feeling, and association, and that are associated with events that have made a significant contribution to the broad patterns of our history.
- Are associated with the lives of significant persons in our past;
- Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack distinction; and/or
- Have yielded, or may be likely to yield, information important to history or prehistory.

STATE

California Environmental Quality Act (Public Resources Code 21000 et seq.) (CEQA)

Section 15064.5 of the CEQA Guidelines (California Code of Regulations Title 14, section 15000 et seq.) requires lead agencies to determine whether proposed projects requiring discretionary government approval may have a significant effect on historic, archaeological, or tribal cultural resources. This determination applies to cultural resources that meet significance criteria qualifying them as "unique" or "of importance," or are listed or determined eligible for listing on the California Register of Historical Resources (CRHR). If a project may have an adverse effect on a unique or important historical or cultural resource, the project is determined to have a significant effect on the environment, and the effect must be mitigated. Under CEQA, a historical resource need not be listed on a local, State, or federal list of historic resources to meet the CEQA impact criteria requiring mitigation.

The CEQA Guidelines specify that when a proposed individual project may adversely affect a CEQA defined historic resource, the lead agency is required to carefully consider the possible project impacts on the historic resource before proceeding (Public Resources Code (PRC) Section 21084 and subsection 21084.1). In determining if there is a significant impact on one or more historic resources, the CEQA Guidelines essentially call for a two-part test: (1) is the resource "historically significant," and (2) would the project cause a "substantial adverse change" in the significance of the resource? Under section 15064.5(a) of the CEQA Guidelines, a historic resource shall be presumed to be historically or culturally significant if it is:

A. A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR (PRC Section 5024.1, Title 14 CCR, Section 4850 et seq.).
B. A resource included in a local register of historical resources, as defined in section 5020.1(k) of the PRC, or identified as significant in a historical resource survey meeting the requirements of section 5024.1(g) of the PRC, shall be/presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
C. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1, Title 14 CCR, Section 4800.3) as follows:

    1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    2. Is associated with the lives of persons important in our past;
    3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; and/or
    4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition, if it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b], and [c]). PRC Section 21083.2(g) defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;

- Has a special and particular quality such as being the oldest of its type or the best available example of its type; and/or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

California Register of Historical Resources (CRHR)

Under the CRHR (and almost identical to CEQA thresholds C.1 through C.4, directly above), a historical resource may be determined significant under one or more of the following four criteria:

A. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
B. It is associated with the lives of persons important to local, California, or national history;
C. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; and/or
D. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

California Senate Bill 18 (Chapter 905, "Traditional Tribal Cultural Places")

Signed into law in 2004, Senate Bill (SB) 18 requires that cities and counties notify and consult with California Native American tribes about proposed local land use planning decisions for the purpose of protecting traditional tribal cultural sites. Cities and counties must provide general and specific plan amendment proposals to California Native American tribes that have been identified by the Native American Heritage Commission (NAHC) as having traditional lands located within the city's boundaries. If requested by the Native American tribes, the city must also conduct consultations with the tribes prior to adopting or amending their general and specific plans. These consultations are for preserving or mitigating impacts to Native American historic, cultural, sacred sites, features, and objects located within the city or county. A tribe has 90 days from the date of contact to request a consultation, unless the tribe agrees to a shorter timeframe. SB 18 also added a new topic that must be addressed in the Open Space Element of the General Plan: open space land for the protection of Native American historic, cultural, sacred sites, features, and objects.

California Assembly Bill 52 (Chapter 532, amends and adds sections to the Public Resources Code, relating to Native Americans)

Assembly Bill (AB) 52 establishes that a project with an effect that may cause a substantial adverse change in the significance of a "tribal cultural resource" is a project that may have a significant effect on the environment. AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area, and (2) the tribe then timely requests formal consultation for that particular proposed project after receiving notification of the project. Consultation must be completed prior to releasing a negative declaration, mitigated negative declaration, or environmental impact report.

AB 52 requires the NAHC to provide each California Native American tribe with: (1) a list of all public agencies that may be a lead agency within the geographic area in which the tribe is traditionally and culturally affiliated, (2) the contact information of those agencies, and (3) information on how the tribe may request those public agencies to notify the tribe of projects for the purposes of requesting consultation.

Public Resources Code Section 5097 (Related to Cultural Resources)

California PRC Section 5097 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. It has been incorporated into Section 15064.5(e) of the CEQA Guidelines.

The NAHC, created in statute in 1976 (Chapter 1332, Statutes of 1976), is a nine-member body whose members are appointed by the Governor. The NAHC identifies, catalogs, and protects Native American cultural resources -- ancient places of special religious or social significance to Native Americans and known ancient graves and cemeteries of Native Americans on private and public lands in California. The NAHC is also charged with ensuring California Native American tribes' accessibility to ancient Native American cultural resources on public lands, overseeing the treatment and disposition of inadvertently discovered Native American human remains and burial items, and administering the California Native American Graves Protection and Repatriation Act (CalNAGPRA), among many other powers and duties. Among the functions of the NAHC is maintenance of lists of Native American Contacts and Most Likely Descendants. The NAHC authorizes Most Likely Descendants the right to determine the treatment, disposition, and analysis of Native American remains.

PRC Sections 5097.9 through 5097.991 establish that no public agency or private party using or occupying public property (or operating on under a public license, permit, grant, lease or contract made after July 1, 1977) shall in any manner interfere with the free expression or exercise of Native American religion as provided in the U.S. Constitution and the California Constitution. It also prohibits such agencies and parties from causing severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site or sacred shrine located on public property, except on a clear and convincing showing that the public interest and necessity so require it.

These sections also establish the state's NAHC. The NAHC is tasked with working to ensure the preservation and protection of Native American human remains, associated grave goods and cultural resources. Towards this end, the NAHC has a strategic plan for assisting the public, development communities, local and federal agencies, educational institutions and California Native Americans to better understand problems relating to the protection and preservation of cultural resources and to serve as a tool to resolve these problems. In 2006, PRC Sections 5097.91 and 5097.98 were amended by AB 2641 to authorize the NAHC to bring legal action when necessary to prevent damage to Native American burial grounds or places of worship. It also established more specific procedures to be implemented in the event that Native American remains are discovered.

California Historical Landmarks

California Historical Landmarks (CHLs) are buildings, structures, sites, or places that have anthropological, cultural, military, political, architectural, economic, scientific, technical, religious, experimental, or other value and that have been determined to have statewide historical significance by meeting at least one of the criteria listed below. The resource must also be approved for designation by the County Board of Supervisors or the City or Town Council in whose jurisdiction it is located, be recommended by the State Historical Resources Commission, or be officially designated by the Director of California State Parks. To be eligible for designation as a Landmark, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California); and/or

- Associated with an individual or group having a profound influence on the history of California. A prototype of, or an outstanding example of, a period, style, architectural movement or construction or one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

California Points of Historical Interest.

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest (Point or Points) designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historic resource may be designated as both a Landmark and a Point. If a Point is later granted status as a Landmark, the Point designation will be retired. In practice, the Point designation program is most often used in localities that do not have a locally enacted cultural heritage or preservation ordinance.

To be eligible for designation as a Point, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type within the local geographic region (city or county);
- Associated with an individual or group having a profound influence on the history of the local area; and/or
- A prototype of, or an outstanding example of, a period, style, architectural movement or construction or one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder.

California Health and Safety Code

Section 7050.5 of the California Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the County coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must contact the NAHC. The CEQA Guidelines (§15064.5) specify the procedures to be followed in case of the discovery of human remains on non-federal land. The disposition of Native American burials falls within the jurisdiction of the NAHC.

California Native American Graves Protection and Repatriation Act

Section 8011 of the California Health and Safety Code intends to do the following:

a. Provide a seamless and consistent state policy to ensure that all California Indian human remains and cultural items be treated with dignity and respect;
b. Apply the state's repatriation policy consistently with NAGPRA (25 U.S.C. Sec. 3001 et seq.), which was enacted in 1990, as subsequently amended, while considering the unique history of California towards California Native American tribes and the canon of construction regarding federal Indian law with respect to laws must be interpreted as the Indians would have understood them, be construed liberally in favor of the Indians, resolve all ambiguities in the law in favor of the Indians, and preserve tribal property rights and sovereignty unless a contrary intent is clearly stated;
c. Facilitate the implementation of NAGPRA with respect to publicly funded agencies and museums in California;
d. Encourage voluntary disclosure and return of Native American human remains and cultural items by a private institution or museum;
e. Provide a process whereby lineal descendants and culturally or geographically affiliated California Native American tribes that file repatriation claims for Native American human remains and cultural items under the NAGPRA (25 U.S.C. Sec. 3001 et seq.) or under this chapter with

California state agencies and museums may request assistance from the commission in ensuring that state agencies and museums are responding to those claims in a timely manner and in facilitating the resolution of disputes regarding those claims; and

f. Provide a process whereby California Native American tribes that are not federally recognized may file claims with agencies and museums for repatriation of human remains and cultural items.

Assembly Bill 978

In 2001, AB 978 expanded the reach of NAGPRA of 1990 and established a state commission with statutory powers to assure that federal and state laws regarding the repatriation of Native American human remains and items patrimony are fully complied with. In addition, AB 978 also included non-federally recognized tribes for repatriation.

Regional and Local

The City of Willits Municipal Code and General Plan (1992) serve to protect known and potential historical resources.

City of Willits Municipal Code

Chapter 17.48 (Historical Resources) of Title 17 (Zoning) of the City of Willits Municipal Code (Municipal Code) was adopted pursuant to Section 37361 of the California Government Code, which authorizes the adoption of special regulations for the protection, enhancement, perpetuation, or use of places, buildings, structures and other objects having special character or special historical or aesthetic interest or value. The Municipal Code defines a Historical Resource as “any building, structure, tree, plant life or site that either serves as a reminder of past eras, events or persons important in local or other history, or represents a significant example of an architectural style of the past”. Conditions may be recommended for designated historical landmarks, including but not limited to: the prohibition of demolition, removal, or alternations other than routine maintenance and repair work without approval of the heritage and arts commission; restriction of allowed or permitted uses; that no buildings or structures exposed to public view within a specified distance of the historical landmark may be placed, erected, moved, removed, enlarged, or altered (excepting routine maintenance and repair work) in a manner that would materially detract from the public visibility and/or enjoyment of the historical landmark, without prior review and approval by the heritage and arts commission; or any other reasonable requirements, restrictions or conditions deemed necessary or appropriate to meet special or unique circumstances affecting the place, building, structure, work of art or other object to be designated as a historical landmark. Chapter 17.48 of the Municipal Code establishes development standards designed, in part, to ensure conservation of the City’s historic resources. Section 17.48.050 (Moving, removal or destruction of historical resource structures—Development projects on historical resource sites) states the following:

A. No historical resource structures shall be enlarged, substantially altered as to its exterior, moved, removed or demolished, except in conformance with this chapter.
B. No development project shall be approved for any land on which a historical resource site is located, except in conformance with this chapter. As used in this chapter, "development project" means the subdivision of land or the issuance of any permit authorizing grading, excavation or construction of buildings or structures.

In addition, Section 17.48.060 (Moving, removal or destruction of historical resource structures—Where no permit is required), highlights the following procedures:

A. Application. This section applies to historical resource structures as to which the moving, removal or destruction requires no permit.
B. Notice of Intention. No person shall move or destroy any historical resource structure as to which this section is applicable unless he shall have filed with the director of planning a written notice of intention to take such action, and unless one of the following shall have occurred:

1. The director of planning shall have authorized the moving, removal or destruction of the historical resource structure pursuant to Section 17.48.070B; or
2. The commission shall have reviewed the proposed action and shall have made the findings necessary to enable the historical resource structure to be removed, demolished or destroyed without the necessity of any waiting or grace period; or
3. The commission shall have authorized removal of the historical resource structure pursuant to plans reviewed pursuant to Section 17.48.080C; or
4. The ninety-day grace period prescribed in Section 17.48.080 shall have elapsed.

City of Willits General Plan (1992)

The Willits General Plan is a policy document that establishes a framework to guide the long-term development of the community. The General Plan sets forth the City's goals and policies regarding land use, circulation, housing, conservation, open space, public health and safety. The General Plan also establishes programs for putting these goals and policies into effect.

Because of its comprehensive and long-range nature, the General Plan, by necessity, has a broad policy focus. It is neither necessary nor desirable for the General Plan to encompass specific details pertaining to individual properties or development projects. Such details are more appropriately incorporated into Specific Plans and Development Agreements prepared in consistency with the overall General Plan.

The Willits General Plan is organized into three volumes. Volume One contains goals, policies and implementation measures for each of the eight General Plan Elements (land use; circulation; conservation and open space; noise; housing; public services, parks and recreation; safety; and economic development). Volume 2 contains the background information and analysis upon which both the General Plan policy document and the environmental analysis are based. Volume 3, the Environmental Impact Report, assesses the environmental effects of the General Plan Revision and identifies mitigation measures for reducing adverse effects to acceptable levels. Collectively, Volumes 1 through 3 comprise the Willits General Plan Revision and Environmental Impact Report.

The General Plan Historical and Archaeological Resources Map (1992) establishes areas that are known and/or have potential to historical or archaeological resources.

AB 52 and SB 18 Process for Willits General Plan Land Use Element Update

In February 2023, the City of Willits sent a letter to the NAHC requesting a current SB 18 and AB 52 Native American Contact List for the Project vicinity and a Sacred Lands File (SFL) search. On February 28, 2023, the NAHC provided a list of 13 tribal contacts with tribal connections to the Planning Area. In accordance with AB 52 and SB 18, on April 12, 2023, the City of Willits notified the following thirteen (13) tribes of the project and invited them to participate in consultation:

- Coyote Valley Band of Pomo Indians
- Guidiville Indian Rancheria
- Hopland Band of Pomo Indians
- Cahto Tribe
- Manchester Band of Pomo Indians of the Manchester Rancheria
- Noyo River Indian Community
- Pinoleville Pomo Nation
- Potter Valley Tribe
- Redwood Valley or Little River Band of Pomo Indians
- Robinson Rancheria of Pomo Indians
- Round Valley Reservation/Covelo Indian Community
- Sherwood Valley Rancheria of Pomo

- Yokayo Tribe

No requests for consultation were received from the 13 Native American tribes that were sent formal notification of the project. As no requests for consultation were received within 30 days specified by PRC Section 21082.3 (d) for AB 52 nor within the 90 days specified by California Government Code Sections 65352.3 and 65352.4, the City of Willits, as Lead Agency, has deemed the tribal consultation process complete. Copies of the NAHC response letter and Native American Contacts List are included in Appendix C.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS

Per the CEQA Guidelines, implementation of the Project would have a significant impact related to cultural resources and tribal cultural resources if it would:

A. Cause a substantial adverse change in the significance of a historic resource as defined by CEQA Guidelines Section 15064.5;
B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5;
C. Cause a substantial adverse change in the significance of a tribal cultural resource as defined by CEQA Guidelines Section 21074; or
D. Disturb any human remains, including those interred outside of dedicated cemeteries.

METHODOLOGY

The significance of a cultural resource and subsequently the significance of an impact to a resource is determined by consideration of whether that resource can increase our knowledge of the past and the importance of that resource to cultural groups, among other things. The determining factors are site content and degree of preservation. A finding of archaeological significance follows the criteria established in the CEQA Guidelines. CEQA Guidelines Section 21084.1, 15064.5(b), and 15064.5 (Determining the Significance of Impacts to Archaeological Resources, Cultural Resources, Tribal Cultural Resources, and Historical Resources) states the following:

(3) […] Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Public Resources Code, Section 5024.1, Title 14 CCR, Section 4852).

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Historical resources are "significantly" affected if there is demolition, destruction, relocation, or alteration of the resource or its surroundings. Generally, impacts to historical resources can be mitigated to below a level of significance by following the Secretary of the Interior's Guidelines for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings [Guidelines Section 15064.6(b)]. Documentation of a historical resource by way of

historic narrative photographs or architectural drawings will not mitigate the impact of demolition below the level of significance [Guidelines Section 15126.4(b)(2)].

Preservation in place is the preferred form of mitigation for archaeological resources, as it retains the relationship between artifact and context, and may avoid conflicts with groups associated with the site [Guidelines Section 15126.4 (b)(3)(A)]. If an archaeological resource does not meet either the historical resource or the more specific "unique archaeological resource" definition, impacts do not need to be mitigated [Guidelines Section 15064.5(e)]. Where the significance of a site is unknown, it is presumed to be significant for the purpose of this EIR investigation.

Consultations between leading agencies and California's local Native American communities play a pivotal role in establishing the existence and importance of potential tribal cultural resources. The potential effects on these resources are closely tied to the specific attributes of each resource. However, as a general trend, impacts may arise in cases involving the destruction or modification of the resource and its surroundings, limitations on accessing the resource, or other disruptive factors.

PROJECT IMPACTS AND MITIGATION

Impact CUL-01: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

As previously discussed, there are several prehistoric sites noted in the vicinity of the City of Willits. The ethnograpohic village of Mitoma is noted to be located in the southwestern portion of the City of Willits. In addition, prehistoric cultural resources are likely to be found at the base of hills and along seasonal and perennial water courses. According to the City of Willits General Plan (1992), the areas along the base of the hills and along the water sources are identified to be potentially sensitive on the historical and archaeological resources map. The NRHP identifies four (4) historical buildings known as the Skunk Train Depot; Willits Carnegie Library; Babcock, Dr. Raymond, House; and Larsen Family House (NRHP, 2023). There are also four (4) creeks that are identified as areas of potential archaeological significance; therefore, the City of Willits has established a no development buffer around them, in order to protect the creeks, and potential resources, from impacts of future development. While there is no site-specific development proposed as part of the Project, future development could cause a substantial adverse change in the significance of known or unknown archaeological resources. This is considered a potentially significant impact.

The Conservation and Open Space Element includes policies, implementations programs, and mitigation measures intended to minimize impacts to historic resources:

> **Policy 3.240** Support the preservation and improvement of buildings and sites of local historical significance.
>
> **Mitigation Measure 4.931** Review of development projects in the vicinity of historic sites noted on the Historical and Archaeological Resources Map (Exhibit 10-1, Volume 2) shall include consideration of visual and architectural impacts on existing structures of historical significance.

The Project proposes the following goals and policies addressing cultural resources, including historical and archaeological resources:

GOAL LU-7 To establish enduring partnerships and consider the needs of all communities in City decision making.

> **Policy LU-7.2: Tribal Consultation**

Coordinate with local Native American tribes in City land use and service planning and ensure that consultation occurs during discretionary project review for the identification, protection, and mitigation of adverse impacts to significant cultural resources.

Implementation LU-7A: Tribal Consultation.

Consistent with State law, Native American Tribes shall be consulted during amendments to the General Plan and CEQA review for the identification, protection and mitigation of adverse impacts to significant cultural resources. Consultation on ministerial permits shall be initiated if it has been determined the project may create a substantial adverse change to a significant cultural resource.

Goal LU-10: Land Use Designations

Policy LU-10.6: General Plan Land Use Map Overlay Designations

The following overlay land use designations are applicable, in addition to the primary land use designation, to ensure protection for important resources, including streamside and historic areas, and hazards, such as floodways and floodplains.

Conservation - Floodway (-FW). This General Plan overlay designation is intended for information purposes and is applied to waterways and primary drainage channels to indicate the need to protect channels for the free flow of storm waters and to indicate the presence of adjacent floodplains for the protection of persons and property.

Historical Resources (-H). This designation is applied, for information purposes, to historical resources within the community. The intent of the Historical Resources classification is to encourage the preservation and enhancement of unique historical resources in the City of Willits.

Riparian Areas (-R). The purpose of this designation is to identify important stream and riparian areas where reasonable buffers should be applied to indicate the need to protect, as part of development review, sensitive fish and wildlife habitats and to minimize the potential for erosion, runoff, and interference with surface water flows and that balance to the greatest extent feasible resource protection and property rights.

Existing Conservation and Open Space Element measures and proposed goals and policies are intended to support designation and protection of cultural and historical resources. Impacts on built environment historical resources can only be determined once a specific project has been proposed because potential impacts on historical resources, cultural resources, and archaeological resources are dependent on both the individual resource and the characteristics of the proposed activity. Therefore, impacts would be potentially significant. However, adherence to the City of Willits Conservation and Open Space Element and Municipal Code (Sections 17.48.050 and 17.48.060) ensures that historical resources are protected from new development projects. Specifically, Section 17.48.050 contains regulations pertaining to the moving, removal, or destruction of historical resource structures. Proposed projects involving historical resource structures and sites are reviewed and decided upon by the Planning Commission. Note, currently the City of Willits Council acts as the Planning Commission.

Precise impacts of future development cannot be identified at this time. Potential impacts would need to be identified at the project level at the time site-specific plans are prepared. The existing policies of the Conservation and Open Space Element and proposed Land Use Element policy enhance procedures for protecting historic resources and avoiding or mitigating actions related to development that might otherwise result in destruction, relocation or alteration of historic resources or their surroundings. Impacts

on historical resources can only be determined once a specific project has been proposed. This is because the effects are highly dependent on both the individual resource and the characteristics of the proposed activity. As such, impacts would be potentially significant.

As future development and infrastructure projects within the Planning Area are considered by the City of Willits, each project would be evaluated for conformance with the General Plan, Municipal Code, and other applicable federal, state, and local regulations relative to historic and potentially historic resources. Subsequent discretionary development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA as part of the City of Willits entitlement review process. Per Chapter 17.48 of the City of Willits Municipal Code, potential historic resources may be considered for a historical landmark designation and would be afforded protections such as requiring approval by the heritage and arts commission to demolish, remove, change, repair, sor alter the appearance of the designated historical resource. Additionally, the Willits General Plan Land Use Element Update proposes the -H zone. Inclusion of the buildings within the inventory in the -H zone acknowledges the protection of historic resources as provided by CEQA and allows application of the California State Historic Building Code to the buildings included therein. Therefore, through compliance with existing regulations related to historical resources and implementation of the proposed policies and programs, the Project would not cause a substantial adverse change in the significance of a historical resource and impacts would be less than significant.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Impact CUL-02: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Historical and pre-contact archaeological resources that meet the definition of archaeological resources under CEQA could be damaged or destroyed by ground-disturbing activities associated with future development allowed under the proposed Project. A substantial adverse change in the significance of an archaeological resource would occur from its demolition, destruction, relocation, or alteration such that the significance of the resource would be materially impaired as per Section 15064.5(b)(1) of the CEQA Guidelines. Should this occur, the ability of the resource to convey its significance, either through containing information important in prehistory or history, or through possessing traditional or cultural significance to Native American or other descendant communities, would be materially impaired.

As discussed above, there are four (4) historic structures within the City of Willits limits. The ethnograpohic village of Mitoma is noted to be located in the southwestern portion of the City of Willits. In addition, prehistoric cultural resources are likely to be found at the base of hills and along seasonal and perennial water courses.

The following goal and policies addressing cultural resources, including archaeological resources are proposed as part of the Project. The goal and policies described below are intended to preserve and protect site-specific cultural and archaeological resources.

Goal LU-7: Coordinate with Local Communities

Policy LU-7.1 Sherwood Valley Rancheria

The Sherwood Valley Band of Pomo Indians is a valuable partner and important neighbor to the City of Willits. Regularly coordinate with representatives of the Sherwood Valley Rancheria on land use, municipal, infrastructure, and services planning and seek partnerships, where appropriate, to achieve mutually beneficial outcomes on Projects that promote the welfare of the City of Willits and the Sherwood Valley Rancheria.

Policy LU-7.2 Tribal Consultation

Coordinate with local Native American tribes in City land use and service planning and ensure that consultation occurs during discretionary project review for the identification, protection, and mitigation of adverse impacts to significant cultural resources.

Implementation LU-7A: Tribal Consultation.

Consistent with State law, Native American Tribes shall be consulted during amendments to the General Plan and CEQA review for the identification, protection and mitigation of adverse impacts to significant cultural resources. Consultation on ministerial permits shall be initiated if it has been determined the project may create a substantial adverse change to a significant cultural resource.

Archaeological resources are protected under federal, state, and local regulations as described above and implementation of the goal and policies proposed under the Project would reduce potential adverse impacts to archaeological resources associated with future development. Additionally, future development under the Project would be subject to the provisions of applicable federal and state cultural resource regulations, as well as the Municipal Code (discussed above in *Regulatory Setting*). Individual projects facilitated under the Project would be required to implement actions included in the Project to reduce impacts to archaeological resources, as well as adhere to state, federal, and local regulations, including Sections 17.48.050 and 17.48.060 of the Municipal Code, which requires protection of existing historic and cultural resources from new development with mitigation, if necessary. Compliance with Project and applicable regulations would reduce impacts to archaeological resources.

Subsequent development and infrastructure projects would be analyzed for potential environmental impacts, consistent with the requirements of CEQA and the City of Willits entitlement review process. However, there is the possibility that archaeological resource or human remains could be inadvertently discovered due to the ground-disturbing activities required during project construction. By including Mitigation Measure CUL-1, the project necessitates the contractor to adhere to a standard protocol throughout the construction phase. This measure would help to ensure the project's alignment with policies for safeguarding archaeological and cultural resources, encompassing human remains. Through the implementation of this mitigation measure, potential adverse effects of the Project on these resources, including human remains, would be prevented, resulting in a less than significant impact. A less than significant impact would occur with mitigation incorporated.

MITIGATION MEASURE

CUL-1. Cultural Resource Discovery Protocols

New Implementation Measure for “Coordinate with Local Communities” Group:

Implementation Measure LU-7.X1: In the event archaeological resources or cultural resources, including human remains, are inadvertently unearthed or discovered during construction, the contractor shall immediately halt all grading/land-clearing activities and contact the City of Willits Community Development Department (CDD). All activity in the vicinity of the resources shall cease until it can be evaluated by a qualified archaeologist and a Native American representative. If the archaeologist and Native American representative determine that the resources may be significant, they shall notify the

CDD and develop an appropriate treatment plan for the resources. The archaeologist shall consult with Native American representatives in determining appropriate treatment for prehistoric or Native American cultural resources. In considering suggested mitigation proposed by the archaeologist and Native American representative, the CDD will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed in other parts of the project area while mitigation for cultural resources is being carried out.

Significance After Mitigation

Impacts would be less than significant with mitigation.

Impact CUL-03: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Future construction projects within the Planning Area could have the potential to disturb or destroy buried Native American human remains as well as other human remains, including those interred outside of formal cemeteries.

Health and Safety Code Section 7050.5, CEQA Guidelines Section 15064.5(e), and PRC Section 5097.98 mandate the process to be followed in the event of an accidental discovery of human remains in a location other than a dedicated cemetery. In the event that human remains are discovered during ground disturbing activities, the County coroner must be called in to assess the remains (Section 15064.5[e] of the CEQA Guidelines). If the County coroner determines that the remains are those of a Native American, the NAHC must be contacted within 24 hours, and the provisions for treating or disposing of the remains and associated grave goods as described in Section 15064.5 of the CEQA Guidelines must be followed.

As future development and infrastructure projects are considered by the City of Willits, each project would be evaluated for conformance with the City of Willits General Plan, Municipal Code, and other applicable state regulations. Subsequent development and infrastructure projects would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. Under Section 15064.5 of the CEQA Guidelines, human remains are protected under the definition of archaeological materials as being “any evidence of human activity.” PRC Section 5097 has specific stop-work and notification procedures to follow in the event that Native American human remains are inadvertently discovered during development activities.

Subsequent development and infrastructure projects would be analyzed for potential environmental impacts, consistent with the requirements of CEQA, pursuant to the City of Willits entitlement review process. Compliance with the policies and programs proposed under the Project and existing regulations, including Health and Safety Code Section 7050.5, CEQA Guidelines Section 15064.5(e), and PRC Section 5097.98, would ensure that potential impacts associated with the inadvertent discovery of human remains would be reduced to **less than significant with mitigation incorporated**.

Mitigation Measure

Mitigation Measure CUL-1 defined above in Impact CUL-02 would be applied to ensure proper protocol would be followed in the event human remains, including those interred outside of formal cemeteries, were uncovered during implementation of future development projects.

Significance After Mitigation

Impacts would be less than significant with mitigation.

Impact TCR-01: Development facilitated by the Project has the potential to cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); and/or resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

According to the letter from the NAHC dated February 28, 2023, the Planning Area is located within the traditional lands or cultural places associated with the Coyote Valley Band of Pomo Indians, Guidiville Indian Rancheria, Hopland Band of Pomo Indians, Cahto Tribe, Manchester Band of Pomo Indians of the Manchester Rancheria, Noyo River Indian Community, Pinoleville Pomo Nation, Potter Valley Tribe, Redwood Valley or Little River Band of Pomo Indians, Robinson Rancheria of Pomo Indians, Round Valley Reservation/Covelo Indian Community, Sherwood Valley Rancheria of Pomo, and Yokayo Tribe.

Prehistoric archaeological sites and isolates are TCRs; additionally, plants and other natural resources, as well as geographic locations can also be tribal cultural resources. Grading of original in situ soils could expose buried TCRs and features including sacred sites. While the Project does not directly propose site specific development with the potential to directly impact a tribal cultural resource, future development facilitated by the Project could cause a substantial adverse change in the significance of a tribal cultural resource. This is considered a potentially significant impact.

Potential impacts to TCRs associated with future development would be reduced through implementation of policies and programs proposed under the Project. Subsequent development and infrastructure projects would be analyzed for potential environmental impacts, consistent with the requirements of CEQA, pursuant to the City of Willits entitlement review process. Subsequent projects implemented in accordance with the project would be subject to the provisions of AB 52 and may require tribal consultation with California Native American tribes that are traditionally and culturally affiliated with the Planning Area. Future AB 52 consultation may identify TCRs not yet found and formally recorded that could be impacted by subsequent projects. Therefore, the project would not increase the likelihood for development that could affect TCRs, and individual projects would adhere to federal, State, and local regulations. In addition, the City of Willits would require implementation of Mitigation Measures TCR-1 and TCR-2 in order to ensure proper treatment of TCRs should they be encountered during implementation of future development facilitated by the Project. Therefore, impacts from the project would be less than significant with mitigation incorporated.

MITIGATION MEASURE

TCR-1. Avoid Impacts to Tribal Cultural Resources

New Implementation Measure for "Coordinate with Local Communities" Group:

Implementation Measure LU-7.X2: When feasible, development facilitated by the project shall be designed to avoid known tribal cultural resources. Known tribal cultural resources within 60 feet of planned construction activities shall be protected by establishing an Environmentally Sensitive Area (ESA) that would be fenced, or otherwise protected, to ensure avoidance. The feasibility of avoidance of tribal cultural resources shall be determined by the City of Willits and applicants in consultation with local California Native American tribe(s).

TCR-2. Inadvertent Discovery of Tribal Cultural Resources

New Implementation Measure for "Coordinate with Local Communities" Group:

Implementation Measure LU-7.X3: If previously unidentified tribal cultural resources are encountered during project implementation, altering the materials and their stratigraphic context shall be avoided and work shall halt immediately. Project personnel shall not collect, move, or disturb cultural resources. A representative from a locally-affiliated Native American Tribe shall be contacted to evaluate the resource and prepare a tribal cultural resources plan identifying methods necessary to protect the resource, in consultation with the City of Willits.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant with implementation of Mitigation Measures TCR-1 and TCR-2.

Impact TCR-02: Implementation of the proposed project would not result in a cumulatively considerable impact to cultural and tribal cultural resources.

The impacts of potential future development under implementation of the Projects on cultural resources and TCRs tend to be site-specific, and cumulative impacts would occur when a series of actions leads to the loss of a substantial type of site, building, or resource. For example, while the loss of a single historic building may not be significant to the character of a neighborhood or streetscape, continued loss of such resources on a project-by-project basis could constitute a significant cumulative effect. This is most obvious in historic districts, where destruction or alteration of a percentage of the contributing elements may lead to a loss of integrity for the district overall. For example, changes to the setting or atmosphere of an area by adding modern structures on all sides of a historically significant building, thus altering the aesthetics of the streetscape, would create a significant impact. Destruction or relocation of historic buildings would also significantly impact the setting.

Future development facilitated by the proposed Project would be primarily located within the developed portions of the Planning Area. This, in conjunction with build-out of the City of Willits and the region, has the potential to cumulatively impact cultural resources and TCRs. As previously discussed, impacts to historical resources, archaeological resources, human remains, or TCRs identified within the areas of potential development in the Planning Area would be less than significant, due to compliance with existing federal, state, and local regulations, goals and policies proposed under the Project and described throughout this section, and identified mitigation measures. Continued compliance with these regulations substantially decreases potential impacts to historical resources, archaeological resources, human remains, and TCRs to the maximum extent practicable and ensures the cumulative impact would be less than significant. Therefore, impacts from the Project would be less than significant with mitigation incorporated.

MITIGATION MEASURE

Mitigation Measures TCR-1 and TCR-2 described above in Impact TCR-01 would be applied to ensure implementation of the proposed Project would not result in a cumulatively considerable impact to cultural and tribal cultural resources.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant with implementation of Mitigation Measures TCR-1 and TCR-2.

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3.6 ENERGY

This section evaluates the impacts to energy resources including electricity, natural gas, and other fuels within the Planning Area due to the Project. The discussion uses the most common measures of energy which varies among the various sources:

- Electrical energy production and use is measured in watt-hours. For example, if a light bulb has a capacity rating of 100 watts, the energy required to keep the bulb on for 1 hour would be 100 watt-hours. On a utility scale, a generator's capacity is typically rated in megawatts, which is one million watts, while energy usage is measured in megawatt-hours (one million-watt hours) or gigawatt-hours (GWh), which is one billion watt-hours.
- Natural gas and propane energy production and use is measured in cubic feet or therms, which is 100 cubic feet of gas.
- Gasoline and diesel production and use is measured in gallons.

ENVIRONMENTAL SETTING

Energy Production

Nearly all of the energy used within the City of Willits is imported from outside of the city including most electricity, and all of the natural gas, propane, and gasoline used by local residents and businesses[1]. This is true for Mendocino County as well. Electrical energy is the only energy source with a significant amount produced in the County. Table 4.6a shows installed electrical generation capacity in megawatts for Mendocino County as of 2016. Hydropower is the dominant electricity generation source in Mendocino County.

Table 4.6a. Mendocino County electricity generation capacity and number of plants by fuel type in 2018.

Fuel	MW	Number of Plants
Hydro	12.7	2
Solar	7	4
Total	**19.7**	**6**

Source: North Coast Resource Partnership, *Climate Mitigation Report for the North Coast Region of California*, April, 2018

Output from hydropower in Mendocino has decreased in recent years due to the historic drought in California. With an average consumption ranging from about 550-700 GWh/year over the last ten years and only about 15-40 GWh/year of generation, Mendocino is a clear importer of electricity.

Energy produced within the city is primarily rooftop and ground-mounted solar collectors serving the immediate needs of the buildings or facilities where they are located. For example, the city has an array of solar panels at the wastewater treatment plant that generates approximately 0.53 megawatt hours of electricity each year which reduces energy costs of plant operations[2].

[1] North Coast Resource Partnership Integrated Strategic Plan: *Climate Change Mitigation, GHG Emissions Reduction And Energy Independence,* 2017

[2] https://www.willitsnews.com/2009/07/24/green-project-update-willits-water-plant-solar-panels/ accessed October 5, 2023.

There are also plans for installing a rooftop solar system on the Willits Branch Library and upgrading the solar system on the roof of City Hall. Complimented by battery storage, these systems not only reduce energy costs of public services, but they will also provide sufficient back up power to maintain basic functions for extended periods of time during power outage events. These locations are available to the public to either stay warm or cool, charge devices, receive critical information, and to operate personal medical devices during emergency events when the power is out.

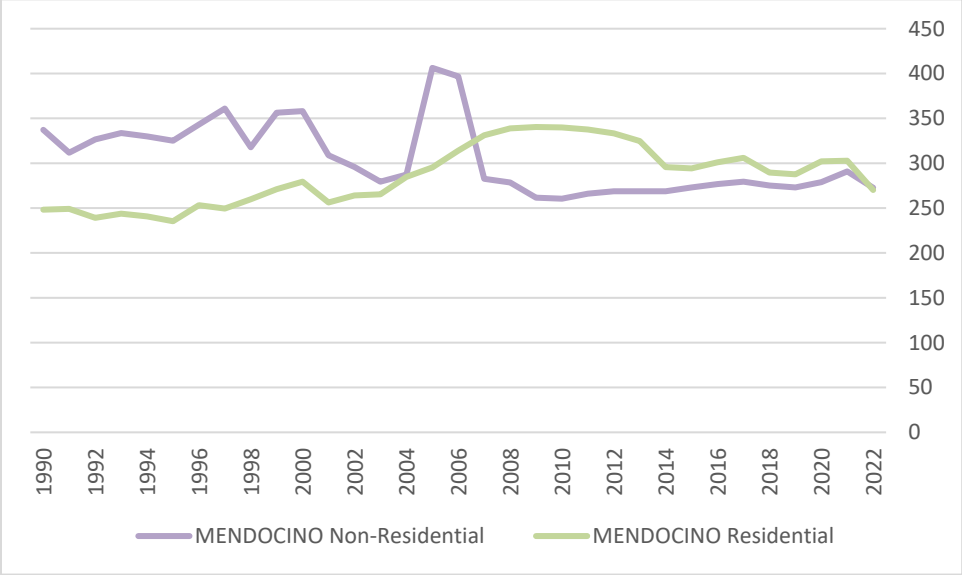
And just outside the city, a large ground-mounted solar system was developed in 2019 which produces enough electricity to power 260 homes[3]. That project was built to support the Evergreen service of Sonoma Clean Power which provides 100% locally generated and renewable energy to Willits customers enrolled in that service.

Energy Use

Electricity

Energy use data specific to the City of Willits is not available, but county-level data can be used to extrapolate trends for the city. Figure 3.6a below compares residential and non-residential[4] electricity use for Mendocino County from 1990 – 2022. The chart shows a significant decrease in energy consumption since 2020. Non-residential energy consumption has dropped by 2.6 percent and residential energy consumption has dropped by 10.6 percent since 2020. Combined residential and non-residential energy use in 2022 was the lowest it has been at any time during the 1990 – 2022 period.

Figure 3.6a Mendocino County Electricity Consumption 1990 - 2022 (Gigawatt Hours)



Source: California Energy Commission, https://ecdms.energy.ca.gov/elecbycounty.aspx accessed October 5, 2023

[3] https://sonomacleanpower.org/news/scp-completes-first-solar-project-in-mendocino-county accessed October 5, 2023.

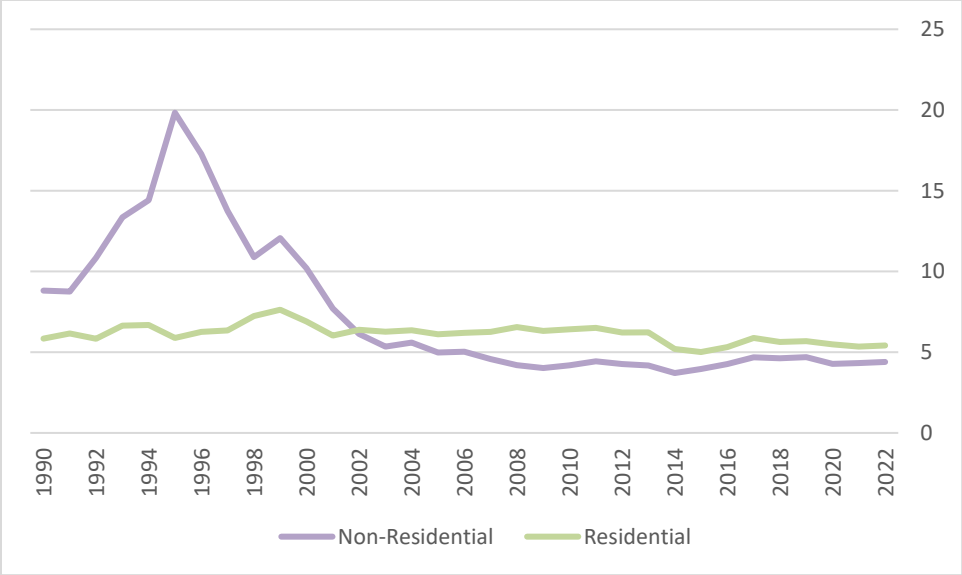
[4] Non-residential electricity use includes electricity used for commercial, industrial, agricultural, and timber production as well as other types of land uses besides homes.

Some electrical power is lost in the transmission and distribution of electricity into service areas. High voltage power lines are more efficient at transmitting electricity and result in less electricity loss than the smaller voltage lines which are used to distribute electricity throughout communities. Substations transfer electricity from high voltage lines into the low voltage distribution lines that provide electricity to homes and businesses. New development that occurs closer to substations will result in less electricity loss because it minimizes the distance electricity has to travel on the less efficient low-voltage power lines. There is one substation (Willits Substation A) that serves the Planning Area located approximately 1.5 miles to the east of the center of the Willits[5].

Natural Gas

The trend toward reduced energy consumption over time is reflected in natural gas use as well. Figure 3.6b below compares residential and non-residential natural gas use for Mendocino County from 1990 – 2022. While residential use of gas has declined only slightly over the previous three decades, non-residential natural gas use has dropped by more than half.

Figure 3.6b Mendocino County Gas Consumption 1990 - 2022 (Millions of Therms)



The potential for leakage of natural gas from transmission lines increases with distance from high pressure natural gas transmission lines. Pipelines develop leaks for numerous reasons, including corrosion, improper fabrication or construction, and damage. Leaks from pipelines are more common in the distribution network, particularly in cast iron and unprotected steel mains that are susceptible to corrosion over time[6]. New development that occurs closer to high-pressure gas transmission lines will result in less natural gas leakage because it minimizes the distance natural gas has to travel in the low-pressure gas lines. There is one high pressure natural gas transmission line in the Planning

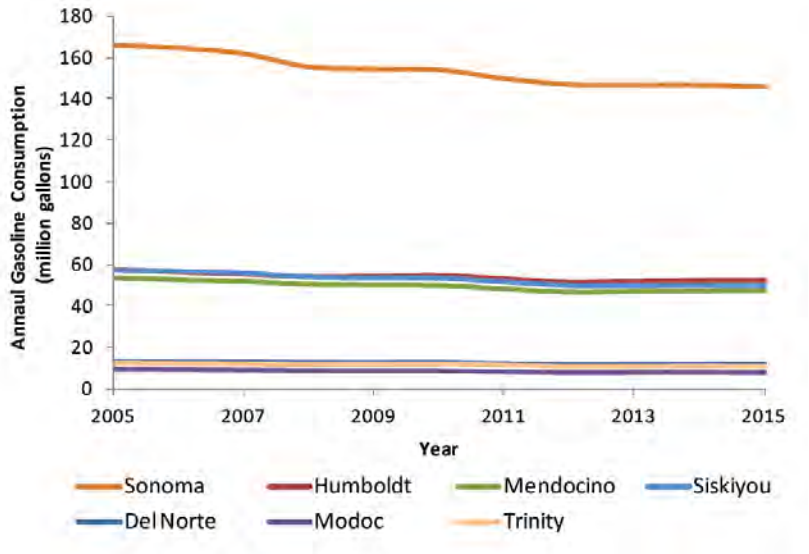
[5] https://www.energy.ca.gov/sites/default/files/2019-05/Operational_Substations.xlsx accessed October 9, 2023
[6] https://www.energy.gov/sites/default/files/2016/04/f30/QTR2015-7E-Natural-Gas-Delivery-Infrastructure.pdf accessed October 9, 2023

Area, which terminates in the south part of Willits near the intersection of Bechtel Road and East Hill Road[7].

Gasoline and Diesel

According to the CEC, gasoline has remained the dominant fuel within the transportation sector, with diesel fuel and aviation fuels following. Compared to other Northern California counties, Mendocino consumes less gasoline and diesel fuel primarily due to differences in population. The below figures from a 2017 North Coast Resource Partnership (NCRP) report show Sonoma County has a much higher rate of gasoline and diesel fuel consumption because that county also has the highest population of all the counties included in the study[8].

Figure 3.6c Estimated Annual Gasoline Sales in the NCRP Region

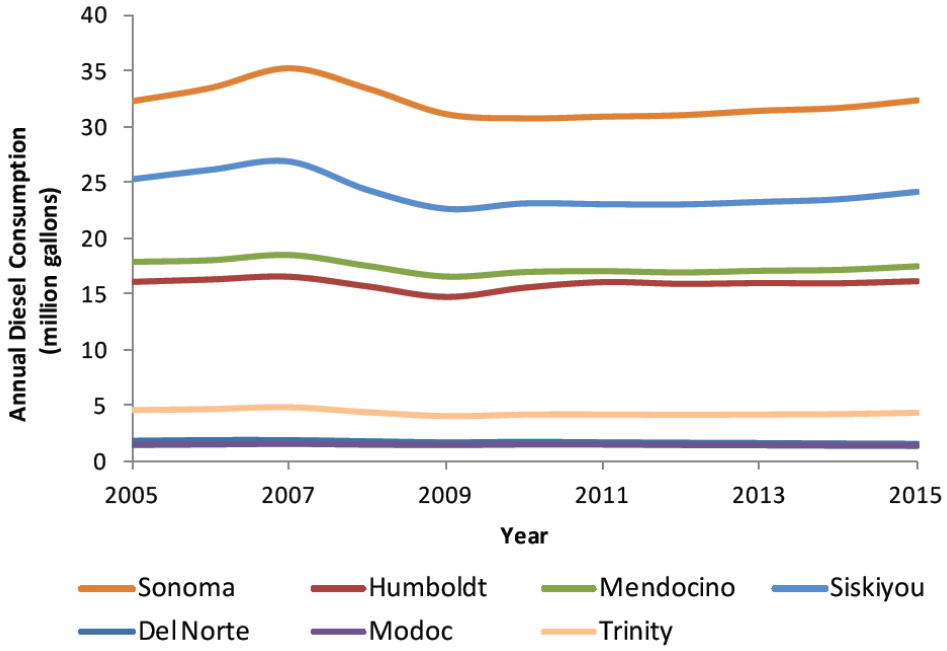


Source: North Coast Resource Partnership Integrated Strategic Plan, *Climate Change Mitigation, GHG Emissions Reduction And Energy Independence*, 2017

[7] https://www.pge.com/en_US/safety/how-the-system-works/natural-gas-system-overview/gas-transmission-pipeline/gas-transmission-pipelines.page accessed October 9, 2023

[8] North Coast Resource Partnership Integrated Strategic Plan, *Climate Change Mitigation, GHG Emissions Reduction And Energy Independence*, 2017

Figure 3.6d Estimated Annual Diesel Sales in the NCRP Region



Source: North Coast Resource Partnership Integrated Strategic Plan, *Climate Change Mitigation, GHG Emissions Reduction And Energy Independence*, 2017

An increasing amount of electricity is being used for transportation energy, which is attributed to light-duty plug-in electric vehicles[9].

REGULATORY SETTING

FEDERAL

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (Public Law 110-140*)* seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The Act sets increased Corporate Average Fuel Economy Standards; the Renewable Fuel Standard; appliance energy efficiency standards; building energy efficiency standards; and accelerated research and development tasks on renewable energy sources (e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration.

Energy Star Program

Energy Star is a voluntary labeling program introduced by the USEPA to identify and promote energy-efficient products to reduce greenhouse gas emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs and heating

[9] https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2017-integrated-energy-policy-report accessed October 9, 2023

and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes (USEPA 2022).

STATE

2002 Assembly Bill 117

Assembly Bill 117 (Stat. 2002, Ch. 838; see California Public Utilities Code section 366.2) authorizes any California city or county, whose governing body so elects, to combine the electricity load of its residents and businesses in a community-wide electricity aggregation program known as Community Choice Aggregation ("CCA").

2002 Senate Bill 1078

In 2002, Senate Bill (SB) 1078 established the California Renewables Portfolio Standards (RPS) Program which requires that 20 percent of retail electricity sales be composed of renewable energy sources by 2017 and was accelerated The program was accelerated in 2015 with SB 350 (de León, 2015) which mandated a 50% RPS by 2030. SB 350 includes interim annual RPS targets with three-year compliance periods and requires 65% of RPS procurement to be derived from long-term contracts of 10 or more years. In 2018, SB 100 (de León, 2018) was signed into law, which again increases the RPS to 60% by 2030 and requires all the state's electricity to come from carbon-free resources by 2045.[10]

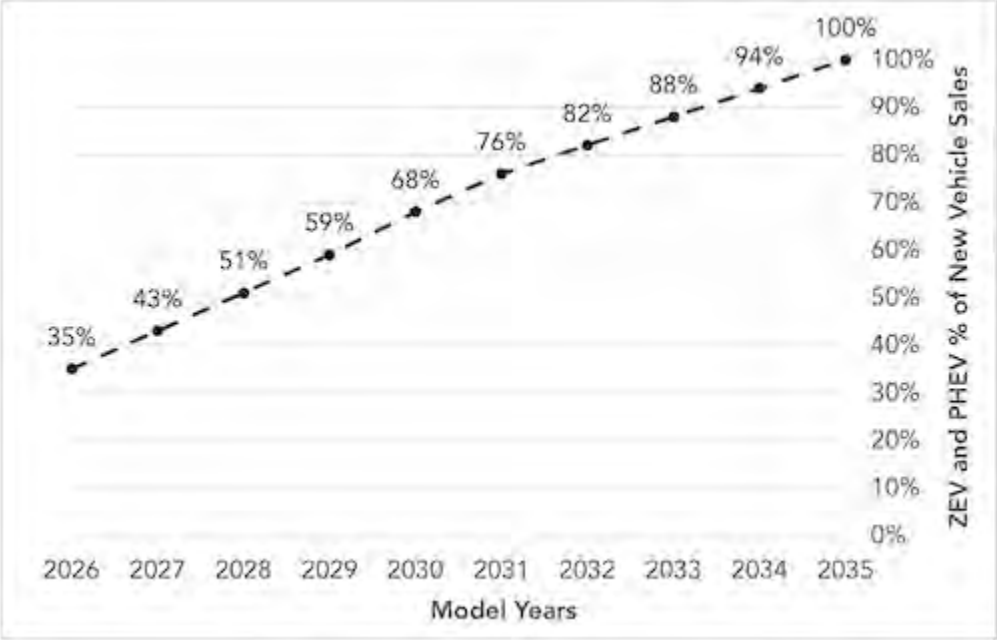
2002 Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 in 2002 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. In January 2012, the California Air Resources Board (CARB) approved the Pavley Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

This legislation was amended in 2022 to support Governor Newsom's Executive Order 79-20 that requires all new passenger vehicles sold in California to have zero emissions by 2035. The Advanced Clean Cars II regulations require an increasing number of zero-emission vehicles (ZEV's) to be sold. Figure 3.6e below shows how the new annual zero-emission vehicle requirement increases over time.

[10] https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps accessed October 12, 2023

Figure 3.6e ZEV sales requirements under the Advanced Clean Cars II Program, 2026 - 2035



Source: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii accessed October 9, 2023

2007 Executive Order S-1-07

Also known as the Low Carbon Fuel Standard, EO S-1-07, issued in 2007, established a statewide goal that requires transportation fuel providers to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. EO S-1-07 was readopted and amended in 2015 to require a 20 percent reduction in carbon intensity by 2030, the most stringent requirement in the nation. The new requirement aligns with California's overall 2030 target of reducing climate changing emissions 40 percent below 1990 levels by 2030, which was set by SB 32 and signed by the governor in 2016.

2009 California Green Building Code

The California Green Building Standards Code (CALGreen) is Part 11 of the California Building Standards Code or Title 24 and is the first statewide "green" building code in the nation. The purpose of CALGreen is to improve public health, safety, and general welfare by enhancing the design and construction of buildings. Enhancements include higher energy efficiency, better air quality, and improved daylighting. The first CALGreen Code was adopted in 2009 and contained only voluntary measures. Many of the original voluntary green building standards became mandatory in the 2010 CALGreen edition, which went into effect in January 2011. It has been updated every three years. The latest version went into effect January 1, 2023.

2015 Senate Bill 350

SB 350, the Clean Energy and Pollution Reduction Act of 2015, has two objectives: to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by 2030 and to double the energy efficiency of electricity and natural gas end users through energy efficiency and conservation.

State Alternative Fuels Plan

AB 1007 requires the California Energy Commission (CEC) to prepare a plan to increase the use of alternative fuels in California. The State Alternative Fuels Plan was prepared by the CEC with CARB and in consultation with other federal, state, and local agencies to reduce petroleum consumption; increase use of alternative fuels (e.g., ethanol, natural gas, liquefied petroleum gas, electricity, and hydrogen); reduce GHG emissions; and increase in-state production of biofuels. The State Alternative Fuels Plan recommends a strategy that combines private capital investment, financial incentives, and advanced technology that will increase the use of alternative fuels; result in significant improvements in the energy efficiency of vehicles; and reduce trips and vehicle miles traveled through changes in travel habits and land management policies. The Alternative Fuels and Vehicle Technologies Funding Program legislation (AB 118, Statutes of 2007 and AB 8, Statutes of 2007) proactively implements this plan.

Appliance Efficiency Regulations

California's Appliance Efficiency Regulations (CCR Title 20, Parts 1600–1608) contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. These standards are updated regularly to allow consideration of new energy efficiency technologies and methods.

Regional and Local

Alternative Fuels Readiness Plan

In January 2022, the California Energy Commission (CEC) published the Northwest California Alternative Fuels Readiness Project which includes a comprehensive alternative fuels readiness plan for the Northwest California region including the City of Willits[11]. The plan presents strategies and actions to encourage the adoption of alternative fuel vehicles. The goal of the plan is to establish and engage a network of public and private stakeholders throughout the region to foster the successful deployment of alternative fuel vehicles, alternative fuels infrastructure, and to develop a robust market for alternative fuels.

The plan encourages local jurisdictions adopt amendments to zoning codes and updates to the permitting process to proactively support and accelerate the deployment and use of alternative fuels. Key recommendations for streamlining the permitting process are summarized as follows:

- Leverage existing codes when drafting codes specific to alternative fuel stations.
- Form a Uniform Code Committee where members of nearby cities and counties collaborate to standardize permitting and inspection fees for alternative fuel infrastructure.
- Provide a clearinghouse of permit process information and where to go to get more information.
- Make online and over-the-counter permitting available for basic alternative fuel installations and upgrades such as creating an "electric vehicle charging station permit" - even if it is the same permit needed to install a washing machine in garage.
- Consider passing policy to wave requirements for other improvements for alternative fuel infrastructure upgrades at existing fueling facilities.

[11] https://www.energy.ca.gov/publications/2022/northwest-california-alternative-fuels-readiness-project accessed October 10, 2023

- Develop and/or amend codes to provide specific requirements for all types of alternative fuels infrastructure.
- Allow for flexibility in the zoning code; eliminate the need for new building permits for straightforward alternative fuel infrastructure.
- Allow flexibility in parking space requirements when the facility owner installs alternative fuel fueling / charging infrastructure.
- Require new construction permits to have electric vehicle charging conduit and/or pre-wiring installed in all structures, meeting or exceeding California building code.

Mendocino County Ordinances

Mendocino County adopted Ordinance No. 4337 determining that implementation of a CCA program is in the public interest and welfare of its residents, and elected to authorize and implement a CCA program within the County of Mendocino. Mendocino County then adopted Ordinance No. 4363 in 2017 authorizing the implementation of the Sonoma Clean Power program within the unincorporated areas of Mendocino County, including the areas being annexed into the new Sphere of Influence for the city.

Willits Municipal Code

Willits Municipal Code Chapter 18.01 is the Community Choice Aggregation Program which authorizes the implementation of the community choice aggregation program by participating with the Sonoma Clean Power Authority to encourage local involvement over the provision of electric services and promoting competitive and renewable energy.

IMPACT ANALYSIS

This section describes the methodology and standards of significance utilized to analyze and determine the proposed Project's potential impacts related to energy resources.

SIGNIFICANCE THRESHOLDS

This analysis uses the significance criteria from the CEQA Guidelines Appendix G. The proposed Sphere of Influence and Land Use Element Update would result in a significant impact on energy resources if it would:

a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation, or

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

METHODOLOGY

The proposed Project involves expanding the land use supply for mixed-use growth in the City of Willits along with modifications to the general plan goals and policies to support that growth in a sustainable form. The Project is described earlier in this EIR and is intended to increase opportunities for where and what type of growth can occur in the city without affecting the current general plan's expected buildout population of 7,500 persons.

The Impacts and Mitigation section reviews the Project to determine how it would affect future energy use and renewable energy production based on the following factors:

- The Project's effect on energy use considers how the potential land use and policy changes of the proposed Project will influence energy per capita use in the city.
- For the renewable energy production and energy efficiency impacts, the analysis focuses on whether the Project would disrupt baseline renewable energy facilities or services or interfere with the implementation of planned improvements.

PROJECT IMPACTS AND MITIGATION

This section discusses potential impacts associated with the proposed Project and provides mitigation measures where necessary.

Impacts On Per Capita Energy Use

Impact EN-01: The proposed project will result in development that has more efficient, and less wasteful energy use during construction and operation, resulting in a beneficial impact.

The City (and Sphere of Influence) is planned to expand to create more opportunity sites for expected growth. The city will remain relatively compact with existing development and new growth concentrated in an area of approximately 2.5 by 3 miles. The proposed Land Use Element changes are intended to stimulate higher density residential and commercial development within infill areas in the city, and the proposed Sphere of Influence changes are intended to facilitate future annexation, as needed, of adjacent areas into the city with commensurate increases in the allowed density and intensity of land uses in these areas. Accordingly, new development under the Project is expected to be more focused and concentrated because there will be more opportunities for new development to occur within and adjacent to the city.

In many ways, the per-capita energy used during construction of new homes and businesses within the Planning Area under the proposed Project is expected to be about the same as under the current General Plan and Sphere of Influence. This is because the same market-based incentives for using construction techniques and materials that minimize the cost of energy (electrical, natural gas and gasoline/diesel) will apply whether that construction occurs in a more compact form under the Project or in a more dispersed manner that would occur under existing conditions.

Also, the energy used to operate the individual homes and businesses that is under the control of the homeowner or business is expected to be about the same under the Project as under current conditions because again the same market-based incentives for operations to minimize the cost of energy (electrical, natural gas and gasoline/diesel) will apply whether the home or business occurs close to existing services under the Project or in a more dispersed manner that would occur under existing conditions.

However, the Project will likely make a difference when it comes to energy wasted through transmission. As discussed earlier in the Environmental Setting section, the efficiency of electrical transmission is reduced in low-power distribution lines branching from the substation located approximately 1.5 miles east of the city. Electrical energy lost (wasted) by new residential and business development within the Planning Area can be minimized by locating new development close to the substation. This energy loss is related to the proximity of the home or business to the substation and is not under the control of the home or business owner.

New development under the Project is expected to occur closer to the substation than under current conditions because the proposed Land Use Element and Sphere of Influence changes create more opportunities for new development closer to the substation compared to existing conditions. In this way the Project minimizes the loss of electricity serving the new development in the Planning Area resulting in a beneficial impact on electrical energy use.

The same benefits apply to natural gas energy as well. The proposed Land Use Element and Sphere of Influence changes create more opportunities for new development closer to the high-pressure natural gas line which ends in the southern part of the city near the intersection of Bechtel Road and East Hill Road. Since potential leakage of natural gas from transmission lines is higher the further away from high pressure natural gas transmission lines, new development under the Project has less potential for loss (waste) of natural gas from leaks in distribution lines than current conditions, resulting in a beneficial impact on natural gas energy use.

The Project will also potentially have beneficial impacts on gasoline and diesel energy use. Chapter 4.17 of this EIR documents the transportation impacts of the proposed Project and concludes vehicle trips generated under the Project are expected to be shorter in length compared current conditions which will result in less gasoline and diesel being used to support residents and businesses in the Planning Area:

> "Attracting growth to the city and adjacent to the city instead of outlying unincorporated areas of the county could reduce future (Vehicle Miles Travelled or "VMT") growth in the region. Based on an evaluation of VMT per capita rates using the VMT+ tool, the unincorporated areas around Willits have home-based VMT per resident rates as high as 30 (baseline for Willits is 22.8) and home-based work VMT per employee rates over 50 (baseline for Willits is 10.0)"

The discussion in Chapter 4.17 goes on to surmise that even lower vehicle use rates and corresponding lower gasoline and diesel energy use are possible due to the proposed Project's policy changes that support infill and mixed-use growth and improved active transportation conditions including LU-2.2 Infill Development and LU-3.1 Complete Streets and several others.

Therefore, this impact is potentially beneficial.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be beneficial without mitigation.

Impacts on Renewable Energy and Energy Efficiency Plans

Impact EN-02: The proposed project will result in development that will not disrupt baseline renewable energy facilities or services or interfere with the implementation of planned improvements, resulting in a less than significant impact.

The City of Willits does not currently have a locally adopted plan addressing renewable energy and energy efficiency.

Renewable Energy Facilities, Services and Plans for Public Facilities, Homes and Businesses

The City has a specific renewable energy project with committed funding to augment the existing solar power array on City Hall. The proposed Land Use Element and Sphere of Influence update is not expected to disrupt or interfere with the implementation of those planned improvements. Similarly, the County's plans to install a solar power system on the Willits Branch Library are not affected by the proposed Land Use Element and Sphere of Influence update.

One result of the Land Use Element Update will be designating the city's Wastewater Treatment Plant site "PS - Public Service". This designation may help secure funding and streamline improvements and upgrades to the existing solar power system at that location by clarifying the allowed uses of the site.

Proposed Policy LU-3.8 Energy Conservation and Reduction and Implementation Measure LU-3B have a broader goal of streamlining permitting for renewable energy projects throughout the City. It seeks to facilitate installation of renewable energy systems, such as solar arrays and the development of battery storage and micro grids, including both accessory and commercial-scale systems.

This proposed policy and implementation measure are expected to benefit and encourage new renewable energy projects supporting homes and businesses in the city by clarifying what types of renewable energy projects are allowed in the various zoning districts and by identifying the applicable performance standards. These new allowances are also intended to benefit existing renewable energy systems by streamlining the permitting pathway for expansion or modification of existing systems.

It is noted that future development under the Project will require installation of energy conservation features in compliance with CalGreen and California Energy codes which will increase the energy efficiency of new development throughout the Planning Area. These features would be required even under current conditions, so this is not considered a beneficial impact of the Project.

Renewable Energy Facilities, Services and Plans for Renewable Energy Used in Transportation

According to a website maintained by Mendocino County there are five existing electric vehicle charging stations in Willits[12]. The comprehensive alternative fuels readiness plan for the Northwest California region referenced earlier in this chapter includes recommendations for zoning and other development code updates to support these existing charging stations and encourage construction of new facilities to meet future demand which is expected to increase dramatically in the coming years as more electric cars are sold. Because gasoline and diesel fuels are a major component of greenhouse gas (GHG) emissions, the proposed implementation measure LU-3B directing the city to adopt GHG reduction measures is expected to result in zoning and other development code updates such as those recommended in the alternative fuels readiness plan. By incentivizing installation of more electric vehicle charging stations in the city the city could potentially increase the use of renewable fuels in meeting the transportation needs of residents and businesses.

Based on the above discussion, this impact is considered less than significant.

Mitigation Measure

No mitigation measures would be required.

[12] https://www.mendocinocounty.org/government/planning-building-services/regulations/electric-vehicle-charging accessed October 11, 2023.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

3.7 GEOLOGY AND SOILS

This section summarizes the existing geologic resources and soils within the Project Site and Planning Area, agencies and regulations related to geology and soils, and analyzes potential impacts that may directly or indirectly result from the proposed Project.

ENVIRONMENTAL SETTING

GEOMORPHIC PROVINCE

California's geomorphic provinces are naturally defined geologic regions that display a distinct landscape or landform. Earth scientists recognize eleven (11) provinces in California. Each region displays unique, defining features based on geology, faults, topographic relief, and climate. These geomorphic provinces are remarkably diverse. They provide spectacular vistas and unique opportunities to learn about Earth's geologic processes and history. The Planning Area is located in the northern half of the Coast Ranges Geomorphic Province of California (CGS 2002).

The Coast Range is a northwest-trending mountain range (2,000 to 4,000, occasionally 6,000 feet elevation above sea level) and set of valleys. The ranges and valleys trend northwest, subparallel to the San Andreas Fault. Strata dip beneath alluvium of the Great Valley a low area between the subducting ocean plate on the west (diving down under the American plate) and the volcanoes to the east (now the Sierra Nevada mountains) [CGS 2002]. To the west is the Pacific Ocean. The Coast Range is composed of thick Mesozoic and Cenozoic sedimentary strata. The northern and southern ranges of the Coast Range are separated by a depression containing the San Francisco Bay. The Planning Area is situated within the northern range, which is dominated by the irregular, knobby, landslide-topography of the Franciscan Complex. The eastern border of the northern range is characterized by strike-ridges and valleys in Upper Mesozoic strata. In several areas, Franciscan rocks are overlain by volcanic cones and flows of the Quien Sabe, Sonoma, and Clear Lake volcanic fields. The Coast Ranges are subparallel to the active San Andreas Fault. The San Andreas Fault is more than 600 miles long, extending from Pt. Arena at the southern end of Mendocino County to the Gulf of California. West of the San Andreas is the Salinian Block, a granitic core extending from the southern extremity of the Coast Ranges to the north of the Farallon Islands off the coast of San Francisco (CGS 2002).

REGIONAL GEOLOGY

The City of Willits (Willits) is located in Mendocino County, about 23 miles north of Ukiah and 30 miles east of Fort Bragg. Willits is situated at the west edge of the valley known as the Little Lake Valley, a small alluvial basin near the head of the Eel River drainage. The Planning Area, which includes Willits, is characterized by relatively flat terrain within the central areas of the Little Lake Valley and steep hills making up the surrounding vistas. Franciscan assemblage rocks compose the uplands surrounding the valley, and unconsolidated Quaternary deposits from the valley floor and overlie moderately consolidated, steeply dipping Pliocene-Pleistocene gravels, which crop out in the southern part of the valley. U.S. Highway 101 follows the west edge of the valley; the main residential area of Willits lies west of the highway, and the industrial and agricultural areas are on the valley floor east of the highway. The northern residential area of Willits appears to be located on two east-west ridges of Franciscan rocks, which are covered by a thin veneer of surficial deposits, whereas the southern residential areas reside on Pliocene-Pleistocene and Quaternary deposits (DOI 1978).

The urban part of Willits lies across a zone of geomorphic features (e.g. scarps, sag ponds, pressure ridges, and offset drainage) of Quaternary (Holocene) age that are indicative of young faulting that can be traced southeastward to the vicinity of Hopland where it merges with the Maacama fault zone. Linear fault-produced features are also found on the east side of the Little Lake Valley (DOI 1978).

MEASURING THE STRENGTH OF AN EARTHQUAKE

Several scales may be used to measure the strength or magnitude of an earthquake. Magnitude scales (ML) measure the energy released by earthquakes. The Richter scale, which represents magnitude at the earthquake epicenter, is an example of an ML. As the Richter scale is logarithmic, each whole number represents a 10-fold increase in magnitude over the preceding number. Table 3.7a represents effects that would be commonly associated with Richter Magnitudes.

Table 3.7a: Richter Magnitudes and Effects

Magnitude	Effects
< 3.5	Typically not felt
3.5 – 5.4	Often felt but damage is rare
5.5 – < 6	Damage is slight for well-built buildings
6.1 – 6.9	Destructive potential over ±60 miles of occupied area
7.0 – 7.9	“Major Earthquake” with the ability to cause damage over larger areas
≥ 8	“Great Earthquake” can cause damage over several hundred miles

Source: USGS No Date(c).

Moment Magnitude (Mw) is used by the U.S. Geological Survey (USGS) to describe the magnitude of large earthquakes in the U.S. The value of moment is proportional to fault slip multiplied by the fault surface area. Thus, moment is a measurement that is related to the amount of energy released at the point of movement. Moment is normally converted to Mw, a scale that approximates the values of the Richter scale. The Mw scale is often preferred over other scales, such as the Richter, because it is valid over the entire range of magnitudes.

Seismic ground shaking hazards are calculated as a probability of exceeding certain ground motion over a period of time, usually expressed in terms of "acceleration." The acceleration of the Earth during an earthquake can be described in terms of its percentage of gravity (g). For example, the 10 percent probability of exceedance in 50 years is an annual probability of 1 in 476 of being exceeded each year (CGS 2016b). This level of ground shaking has been used for designing buildings in high seismic areas. This probability level allows engineers to design buildings for larger ground motions than what is expected to occur during a 50-year interval, which will make buildings safer than if they were only designed for the ground motions that are expected to occur in the next 50 years.

In contrast, other scales describe earthquake intensity, which can vary depending on local characteristics. The Modified Mercalli Scale (MM) expresses earthquake intensity at the surface on a scale of I through XII. The following table 3.7b, represents the potential effects of an earthquake based on the Modified Mercalli Intensities.

Table 3.7b: Richter Magnitude as Compared to Modified Mercalli Intensities and Effects

Richter Magnitude	Modified Mercalli	Effects of Intensity
0.1 – 0.9	I	Earthquake shaking not felt
1.0 – 2.9	II	Shaking felt by those at rest.
3.0 – 3.9	III	Felt by most people indoors, some can estimate duration of shaking.
4.0 – 4.5	IV	Felt by most people indoors. Hanging objects rattle, wooden walls and frames creak.

Richter Magnitude	Modified Mercalli	Effects of Intensity
4.6 – 4.9	V	Felt by everyone indoors, many can estimate duration of shaking. Standing autos rock. Crockery clashes, dishes rattle and glasses clink. Doors open, close and swing.
5.0 – 5.5	VI	Felt by all who estimate duration of shaking. Sleepers awaken, liquids spill, objects are displaced, and weak materials crack.
5.6 – 6.4	VII	People frightened and walls unsteady. Pictures and books thrown, dishes and glass are broken. Weak chimneys break. Plaster, loose bricks and parapets fall.
6.5 – 6.9	VIII	Difficult to stand. Waves on ponds, cohesionless soils slump. Stucco and masonry walls fall. Chimneys, stacks, towers, and elevated tanks twist and fall.
7.0 – 7.4	IX	General fright as people are thrown down, hard to drive. Trees broken, damage to foundations and frames. Reservoirs damaged, underground pipes broken.
7.5 – 7.9	X	General panic. Ground cracks, masonry and frame buildings destroyed. Bridges destroyed, railroads bent slightly. Dams, dikes and embankments damaged.
8.0 – 8.4	XI	Large landslides, water thrown, general destruction of buildings. Pipelines destroyed, railroads bent.
8.5 +	XII	Total nearby damage, rock masses displaced. Lines of sight/level distorted. Objects thrown into air.

Source: USGS No Date(c).

SEISMIC HAZARDS

Seismic hazards include both rupture (surface and subsurface) along active faults and ground shaking, which can occur over wider areas. Ground shaking, produced by various tectonic phenomena, is the principal source of seismic hazards in areas devoid of active faults. Northern California is prone to seismic activity and their frequent occurrence is widely accepted as a factor for future developments.

As provided on Figure S-1 of the Draft 2019 Willits General Plan Safety Element Update (Safety Element), Willits is prone to seismic hazards (see Appendix D). Seismic shaking is of concern for Willits because of the proximity of numerous active faults – San Andreas, Maacama, and Healdsburg faults, and the Konocti Bay fault zone. The Maacama fault runs through Little Lake Valley. The San Andreas fault system is considered capable of generating major earthquakes (greater than 9.0 Richter magnitude). The portion of the San Andreas fault between Cape Mendocino and San Francisco experienced up to 20 feet of displacement during the great 1906 (San Francisco) earthquake. The recurrence for great earthquakes is estimated to be about 100 years and major events may recur every 5 to 15 years. According to the California Geological Survey's (CGS) Probabilistic Seismic Hazard Assessment Program, Willits is considered to be within an area that is predicted to have a 10 percent probability that a seismic event would produce horizontal ground shaking of 90 to 170 percent within a 50-year period (CGS 2016b). This level of ground shaking correlates to a Modified Mercalli intensity of V to VII, light to strong.

The Earthquake Catalog data published by the USGS Earthquake Hazards Program [No Date(b)] tracks earthquakes occurring around the world and identifies earthquakes by size (magnitude), location, time, and type (e.g., earthquake or non-earthquakes like an explosion, collapse, volcanic eruption, etc.). No earthquakes were identified within the Planning Area with a magnitude of 6.0 or greater; however,

earthquakes with a magnitude of 6.0 or greater are documented in the region. The following table presents these 6.0 or greater earthquakes within the region since 1951.

Table 3.7c: Significant Earthquakes in the Region

Magnitude	Intensity	Location	Year
6.4	VII	9 miles WSW of Ferndale, CA	2022
6.2	V	4 miles N of Petrolia, CA	2021
6.0	IV	South Napa	2014
6.5	VII	23 miles WNW of Ferndale, California	2010
6.6	N/A	20 miles SW of Ferndale, California	1992
6.5	N/A	12 miles WSW of Ferndale, California	1992
7.2	N/A	12 miles SSW of Scotia, California	1992
6.0	N/A	19 miles SSW of Scotia, California	1991
6.6	N/A	19 miles NW of Shelter Cove, California	1952
6.0	N/A	33 miles SW of Ferndale, California	1951

Source: USGS No Date(b).

SECONDARY HAZARDS

Secondary seismic hazards typically include seismically induced landslides and liquefaction. Descriptions of these two hazards are provided below.

Seismically Induced Landslides

During a seismic event, areas with steep topography, weak geologic formations, and/or a combination of these conditions can experience movement as a result of seismic shaking. Most of these failures occur in areas already prone to movement due to the presence of existing landslides. See the Landslide discussion below for further detail.

Liquefaction

Liquefaction is a phenomenon that occurs when intense vibrations from an earthquake cause saturated soil to lose stability and act more like a liquid than a solid. This poses significant problems for buildings and other structures in areas where liquefaction can occur, as the ground may give way under the weight of the structure and its foundation. In addition, underground structures are also vulnerable to liquefaction. Areas of the city of Willits where groundwater is shallower than fifty feet may be prone to liquefaction, which would require additional analysis and mitigation if liquefiable materials (loose sandy soils) are present. No historic impacts associated with liquefaction have occurred within Willits (City of Willits 2019).

SOILS

The Natural Resource Conservation Service (NRCS) delineates soil units and compiles soils data as part of the National Cooperative Soil Survey. On September 22, 2023, a Custom Soil Report was downloaded for the Planning Area using the NRCS Web Soil Survey Program (see Appendix D). Below is a brief description of the most prominent soils within the Planning Area. Additional details on each soil type is provided in Appendix D.

Gielow Series

The Gielow Series consists of deep, somewhat poorly drained soils on alluvial plains and fans. These soils are formed in alluvium from sedimentary rocks. Slope ranges from 0 to 5 percent. The climate is subhumid with hot dry summers and cool moist winters. The mean annual precipitation is about 32-55 inches, and the mean annual temperature is about 54 to 57 degrees F. The soil is used for vineyards,

orchards, hay and pasture, wildlife, and watershed, and limited homesite developments. Vegetation consists of annual and perennial grasses and forbs, occasional sedges and scattered oaks. This soils series occurs in northern coastal California. The soil is not extensive.

Feliz Series

The Feliz series consists of very deep, well drained soils on flood plains. These soils are formed in alluvium derived from mixed sedimentary rocks. Slope ranges from 0 to 8 percent. The mean annual precipitation is about 37 inches, and mean annual temperature is about 57 degrees F. The soils are used cropland growing walnuts, pears, prunes, grapes and irrigated pasture. The soils occur in Northern California in the valleys of the Coast Range. The soils are not extensive.

Cole Series

The Cole series consists of very deep, somewhat poorly drained soils on stream terraces, flood-plain steps, and alluvial fans. These soils are formed in alluvium derived from mixed sources. Slope ranges from 0 to 5 percent. The mean annual precipitation is about 40 inches and the mean annual air temperature is about 60 degrees Fahrenheit. The soils are used primarily for the production of orchards, vineyards, truck crops, and irrigated pasture. Vegetation includes oak-grass with some shrubs and forbs. This soils series occurs in north coastal counties of California. The soils are moderately extensive.

Wohly Series

The Wohly Series consists of very deep, well drained soils on hills and mountains. These soils are formed in residuum weathered from sandstone and shale. Slopes range from 9 to 75 percent. The mean annual precipitation is about 55 inches, and the mean annual temperature is about 55 degrees F. This soil is used for limited timber production and firewood production. Vegetation consists of Douglas-fir, tanoak, interior live oak, black oak, Pacific madrone, manzanita, and poison oak. This soil occurs primarily in the Siskiyou-Trinity area. The soils are not extensive.

Casabonne Series

The Casabonne Series consists of very deep, well drained soils on hills and mountains. These soils are formed in colluvium and residuum weathered from sandstone or shale. Slopes range from 9 to 75 percent. The mean annual precipitation is about 60 inches, and the mean annual temperature is about 55 degrees F. The soil is used for timber production. Vegetations consist of Douglas-fir, tanoak, Pacific madrone, and western bracken fern. This soil primarily occurs in the Siskiyou-Trinity area of California. The soils are moderately extensive.

EROSION

Soil erosion data for the Planning Area were determined from the Custom Soil Report (2023) for the Planning Area (see Appendix D). This report summarizes those soil attributes used by the Revised Universal Soil Loss Equation Version 2 (RUSLE2) for the map units in the selected area. Soil property data for each map unit component includes the hydrologic soil group, erosion factor “K” (indicating the susceptibility of the soil to sheet and rill erosion by water), soil loss factor “T” (indicating the maximum amount of erosion at which the quality of a soil as a medium for plant growth can be maintained), and the representative percentage of sand, silt, and clay in the surface horizon.

Within the Planning Area, the erosion factor “K” varies from 0.15 to 0.37, which is considered a low to moderate potential for erosion. Given the drainage characteristics of the majority of the soils and the nearly level topography of the Planning Area, runoff erosion hazard is considered low. The wind erosion

potential ranges from moderate-to-high during the spring, summer, and fall; however this potential for wind erosion typically diminishes during the winter.

EXPANSIVE SOILS

The NRCS delineates soil units and compiles soils data as part of the National Cooperative Soil Survey. The following definitions regarding linear extensibility (also known as shrink-swell potential or expansive potential) are provided by the National Soil Survey Handbook (NSSH, 2023).

- Linear extensibility refers to the change in length of an unconfined clod as moisture content is decreased from a moist to a dry state. It is an expression of the volume change between the water content of the clod at 1/3- or 1/10-bar tension [33 kilopascal (kPa) or 10kPa tension] and oven dryness. The volume change is reported in the table as percent change for the whole soil. The amount and type of clay minerals in the soil influence volume change.
- The shrink-swell potential is low if the soil has a linear extensibility of less than 3 percent; moderate if 3 to 6 percent; high if 6 to 9 percent; and very high if more than 9 percent. If the linear extensibility is more than 3, shrinking and swelling can cause damage to buildings, roads, and other structures and to plant roots. Special design commonly is needed.

Expansive soil properties can cause substantial damage to building foundations, piles, pavements, underground utilities, and/or other improvements. Structural damage, such as warping and cracking of improvements, and rupture of underground utility lines, may occur if the expansive potential of soils is not considered during the design and construction of improvements.

Linear extensibility is a method for measuring expansion potential. The expansion potential is low if the soil has a linear extensibility of less than 3 percent; moderate if 3 to 6 percent; high if 6 to 9 percent; and very high if more than 9 percent. If the linear extensibility is more than 3, shrinking and swelling can cause damage to buildings, roads, and other structures and to plant roots. Special design commonly is needed.

According to the Custom Soil Report (2023) for the Planning Area (see Appendix D), soils in the Planning Area vary from a low shrink-swell potential to a high shrink-swell potential.

LANDSLIDE

A landslide is the movement of earth materials down slopes and areas of steep topography. Although they are often caused by earthquakes, landslides can occur when a sloped surface is no longer able to support the material contained within or sitting above it. This instability can be caused by the sheer weight of the loose material or can be aided by other events such as heavy rain. When rain causes a slope to fail, the movement of earth materials is typically referred to as a mudslide. Both landslides and mudslides move with great force and pose significant danger to buildings and other structures. In some circumstances, these events may cause bodily harm if bystanders are unable to move out of the path of the landslide in time. Landslides present potential risk to the Planning Area, mainly along the southern and western portions of the city limits. Anticipating the risk of landslides in the areas identified by Figures S-3a and S-3b of the Safety Element (2019), see Appendix D, are important for protecting the residents, businesses and community assets located in these locations.

LATERAL SPREADING

Lateral spreading typically results when ground shaking moves soil toward an area where the soil integrity is weak or unsupported, and it typically occurs on the surface of a slope, although it does not occur strictly on steep slopes. Oftentimes, lateral spreading is directly associated with areas of liquefaction. The potential for liquefaction exists in the hillside and waterfront areas; lateral spreading of soils may occur along hillsides in the Planning Area.

SUBSIDENCE

Land subsidence is the gradual settling or sinking of an area with little or no horizontal motion due to changes taking place underground. It is a natural process, although it can also occur (and is greatly accelerated) as a result of human activities. Common causes of land subsidence from human activity include: pumping water, oil, and gas from underground reservoirs; dissolution of limestone aquifers (sinkholes); collapse of underground mines; drainage of organic soils; and initial wetting of dry soils. A review of areas of land subsidence in California provided by the USGS indicates land subsidence has not been recorded as an issue in the Planning Area [USGS No Date(a)].

TSUNAMI/SEICHES

Tsunamis and seiches are standing waves that occur in the ocean or relatively large, enclosed bodies of water (i.e., Lake Tahoe) that can follow seismic, landslide, and other events from local sources (California, Oregon, Washington coast) or distant sources (Pacific Rim, South American Coast, Alaska/Canadian coast). Willits is not within a tsunami or seiche hazard area.

Paleontological Resources

Among the natural resources deserving conservation and preservation, are the often-unseen records of past life buried in the sediments and rocks below the pavement, buildings, soils, and vegetation which now cover most of the area. These records – fossils and their geologic context – most likely exist below the surface in and near the Planning Area, and span millions of years in age of origin. Fossils constitute a non-renewable resource: once lost or destroyed, the exact information they contained can never be reproduced.

Paleontology is a science that attempts to unravel the meaning of these fossils in terms of the organisms they represent, the ages and geographic distribution of those organisms, how they interacted in ancient ecosystems and responded to past climatic changes, and the changes through time.

The sensitivity of a given area or body of sediment with respect to paleontologic resources is a function of both the potential for the existence of fossils and the predicted significance of fossils that may be found there. The primary consideration in the determination of paleontologic sensitivity of a given area, body of sediment, or rock formation is its potential to include fossils. Information that can contribute to assessment of this potential includes: 1) direct observation of fossils within the project area; 2) the existence of known fossil localities or documented absence of fossils in the same geologic unit (e.g., “Formation” or one of its subunits); 3) descriptive nature of sedimentary deposits (such as size of included particles or clasts, color, and bedding type) in the area of interest compared with those of similar deposits known elsewhere to favor or disfavor inclusion of fossils; and 4) interpretation of sediment details and known geologic history of the sedimentary body of interest in terms of the ancient environments in which they were deposited, followed by assessment of the favorability of those environments for the preservation of fossils.

The most general paleontological information can be obtained from geologic maps, but geologic cross sections (i.e., slices of the layer cake to view the third dimension) must be reviewed for each area in question. These usually accompany geologic maps or technical reports. Once it can be determined which formations may be present in the subsurface, the question of presence of paleontological resources must be addressed. Even though a formation is known to contain fossils, they are not usually distributed uniformly throughout the many square miles the formation may cover. Other resources to be considered in the determination of paleontological potential are regional geologic reports, site records on file with paleontological repositories, and site-specific field surveys.

Significant paleontological resources are fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and invertebrate animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important.

Paleontologists consider all vertebrate fossils to be of significance. Fossils of other types are considered significant if they represent a new record, new species, an oldest occurring species, the most complete specimen of its kind, a rare species worldwide, or a species helpful in the dating of formations. However, even a previously designated low potential site may yield significant fossils.

REGULATORY SETTING

FEDERAL

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act of 1977 (42 USC, 7701 et seq.) requires the establishment and maintenance of an earthquake hazards reduction program by the federal government.

Executive Order 12699

Signed in January 1990, this executive order of the President implements provisions of the Earthquake Hazards Reduction Act for “federal, federally assisted, or federally regulated new building construction” and requires the development and implementation of seismic safety programs by federal agencies.

International Building Code (IBC)

The purpose of the International Building Code (IBC) is to provide minimum standards to preserve the public peace, health, and safety by regulating the design, construction, quality of materials, certain equipment, location, grading, use, occupancy, and maintenance of all buildings and structures. IBC standards address foundation design, shear wall strength, and other structurally related conditions.

STATE

California Building Standards Code

Title 24 of the California Code of Regulations (CCR), known as the California Building Standards Code (CBSC) or simply "Title 24,” was last update in 2022. The CBSC contains the regulations that govern the construction of buildings in California. The CBSC includes 12 parts: California Building Standards Administrative Code, California Building Code (CBC), California Residential Building Code, California Electrical Code, California Mechanical Code, California Plumbing Code, California Energy Code, California Historical Building Code, California Fire Code, California Existing Building Code, California Green Building Standards Code (CAL Green Code), and the California Reference Standards Code. Through the CBSC, the state provides a minimum standard for building design and construction. The CBSC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. It also regulates grading activities, including drainage and erosion control.

California Health and Safety Code

Section 19100 et seq. of the California Health and Safety Code establishes the state’s regulations for earthquake protection. This section of the code requires structural designs to be capable of resisting likely stresses produced by phenomena such as strong winds and earthquakes.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 sets forth the policies and criteria of the state Mining and Geology Board, which governs the exercise of governments’ responsibilities to prohibit the

location of developments and structures for human occupancy across the trace of active faults. The policies and criteria are limited to potential hazards resulting from surface faulting or fault creep within Earthquake Fault Zones, as delineated on maps officially issued by the State Geologist. Working definitions include:

- Fault – a fracture or zone of closely associated fractures along which rocks on one side have been displaced with respect to those on the other side;
- Fault Zone – a zone of related faults, which commonly are braided and sub parallel, but may be branching and divergent. A fault zone has a significant width (with respect to the scale at which the fault is being considered, portrayed, or investigated), ranging from a few feet to several miles;
- Sufficiently Active Fault – a fault that has evidence of Holocene surface displacement along one or more of its segments or branches (last 11,000 years); and
- Well-Defined Fault – a fault whose trace is clearly detectable by a trained geologist as a physical feature at or just below the ground surface. The geologist should be able to locate the fault in the field with sufficient precision and confidence to indicate that the required site-specific investigations would meet with some success.

“Sufficiently Active” and “Well Defined” are the two criteria used by the state to determine if a fault should be zoned under the Alquist-Priolo Act.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, passed in 1990, addresses non-surface fault rupture earthquake hazards, including liquefaction and seismically-induced landslides. Under the Act, seismic hazard zones are to be mapped by the State Geologist to assist local governments in land use planning. The program and actions mandated by the Seismic Hazards Mapping Act closely resemble those of the Alquist-Priolo Earthquake Fault Zoning Act (which addresses only surface fault-rupture hazards) and are outlined below:

The State Geologist is required to delineate the various “seismic hazard zones.”

- Cities and counties, or other local permitting authority, must regulate certain development “projects” within the zones. They must withhold the development permits for a site within a zone until the geologic and soil conditions of the site are investigated and appropriate mitigation measures, if any, are incorporated into development plans.
- The state Mining and Geology Board provides additional regulations, policies, and criteria to guide cities and counties in their implementation of the law. The Board also provides guidelines for preparation of the Seismic Hazard Zone Maps and for evaluating and mitigating seismic hazards.
- Sellers (and their agents) of real property within a mapped hazard zone must disclose that the property lies within such a zone at the time of sale.

Caltrans Seismic Design Criteria

The California Department of Transportation (Caltrans) has Seismic Design Criteria (SDC), which is an encyclopedia of new and currently practiced seismic design and analysis methodologies for the design of new bridges in California. The SDC adopts a performance-based approach specifying minimum levels of structural system performance, component performance, analysis, and design practices for ordinary standard bridges. The SDC has been developed with input from the Caltrans Offices of Structure Design, Earthquake Engineering and Design Support, and Materials and Foundations. Memo 20-1 Seismic Design Methodology (Caltrans 2010) outlines the bridge category and classification, seismic performance

criteria, seismic design philosophy and approach, seismic demands and capacities on structural components, and seismic design practices that collectively make up Caltrans' seismic design.

Division of Mines and Geology
The California Division of Mines and Geology (DMG) operates within the Department of Conservation (DOC). The DMG is responsible for assisting in the utilization of mineral deposits and the identification of geological hazards.

California Geological Survey
Similar to the DMG, the CGS operates within the DOC and is responsible for assisting in the identification and proper utilization of mineral deposits, as well as the identification of fault locations and other geological hazards.

State Water Resources Control Board National Pollutant Discharge Elimination System Program
In California, permitting authority for the National Pollutant Discharge Elimination System (NPDES) is administered by the SWRCB. Construction projects that disturb more than one (1) acre of land, or projects that result in less than one (1) acre but are part of a larger common plan of development that totals one or more acre of land disturbance, are subject to the requirements of General Construction Activity Stormwater Permit (Construction General Permit Order 2022-0057-DWQ, also known as the CGP), which requires operators of such construction sites to implement stormwater controls and develop a Stormwater Pollution Prevention Plan (SWPPP) identifying specific Best Management Practices (BMPs) to be implemented to minimize the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. The CGP also requires post-construction BMPs to reduce runoff and pollutants in stormwater discharges (SWRCB 2022).

REGIONAL AND LOCAL

Vision 2020 Willits General Plan Revision (1992)
The General Plan (1992), includes the a series of safety policies (Section 7.200) to be applied to development within the City as it concerns the health and safety of structures and individuals. At this time that this EIR was drafted the 2019 Draft Safety Element Updated, which was prepared to address changes in state law since the Safety Element was adopted in 1992, had not yet been adopted. The following are applicable policies from the current General Plan Safety Element.

- 7.200 Safety Policies:
  - 7.250 Require geologic, seismic and soil analyses and acceptable mitigation of potential impacts for projects proposed within the Alquist Priolo seismic study zone.
  - 7.260 Technical reports addressing the geologic hazards of development sites within the seismic study zone shall be prepared by an independent getotechnical consultant approved by the city at the expense of the applicant.
  - 7.270 Development of structures designed for human occupancy shall be prohibited within 50 feet of mapped fault traces.
  - 7.280 Ensure that all new construction is built to established minimum standards with respect to seismic safety.
  - 7.300 Safety Implementation Measures
  - 7.320 Maintain regular fire and seismic safety inspection programs with priority given to emergency facilities, public buildings and older structures.
  - 7.340 Establish inspection procedures to ensure that all grading and foundation work is observed and documented at critical states of construction.

- 7.350 Consider fire, flooding, geologic and seismic safety risks in reviewing proposals for development.

- Safety Mitigation Measures
  - 4.531 The California Division of Mines and Geology has prepared a map designating special studies zones in accordance with the Alquist-Priolo Special Studies Act. Developers whose project sites are within special studies zones must demonstrate that the sites are not threatened by surface displacement. For development within the zone, the General Plan requires that geologic, seismic and soil analysis be prepared at the applicant's expense by licensed engineers approved by the City. The Community Safety Map (Volume 2, Exhibit 9-1) illustrates the portions of the City which fall within the special studies zone.
  - 4.352 The General Plan prohibits the development of structures designed for human occupancy within 50 feet of mapped fault traces.
  - 4.353 All new construction is required to meet minimum seismic safety standards.
  - 4.621A Potential threats to people or aquatic life, whether issues of water quality or quantity, are addressed by the Mendocino County Health Department on a regular basis.
  - 4.621F The Willits General Plan Safety Map shows the Federal Flood Insurance Rate Map designations for floodway zones. These zones are subject to restricted development which adequately prevents significant hazards or material damage.

City of Willits Municipal Code

The City of Willits Municipal Code contains various regulations pertaining to geology and soil resources. Title 15, Buildings and Construction Section 15.04 implements the requirements of the California Building Code, which includes seismic design provisions that regulate the construction, design, quality of materials, location, maintenance, use, and occupancy of buildings and Chapter 15.36 contains requirements relating earthquake hazard reduction in existing buildings.

Design and Construction Standards

In 2009, the City of Willits developed a 100% Draft Design and Construction Standards (Standards), which requires projects that disturb one (1) acre or more prepare and implement a SWPPP in accordance with the CGP. Additionally, the City of Willits Standards require that projects that involves submitting a Notice of Intent (NOI) to the SWRCB must submit a copy of the SWPPP as part of an Erosion Control Permit application to the City of Willits. Low Impact Design (LID) Guidelines for Stormwater Management are included as Appendix B of the City of Willits Standards, and discuss various LID stormwater management strategies, including bioretention, tree box filters, permeable pavers, soil amendments, and green roofs. These guidelines and standards were updated in 2011.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS

Consistent with Appendix G of the CEQA Guidelines, the proposed project will have a significant impact on geology and soils if it will:

- Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - o Rupture of a known earthquake fault, as delineated on the most recent Alquist- Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42;

  - Strong seismic ground shaking;
  - Seismic-related ground failure, including liquefaction; or
  - Landslides.
- Result in substantial soil erosion or the loss of topsoil;
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (UBC, 1994), creating substantial direct or indirect risks to life or property;
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water; or
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

METHODOLOGY

Potential impacts on geology and soils have been analyzed based on the potential for the proposed Project to result in seismic hazards, soil resources, and paleontological resources, as indicated in the thresholds above.

PROJECT IMPACTS AND MITIGATION

Impact GEO-01: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of known fault; ii) Strong seismic ground shaking; iii) Seismic-related ground failure, including liquefaction; or iv) landslides.

Development activities facilitated by the implementation of the proposed Project may place structures in areas with seismic sensitivity. Willits, as with much of California, is subject to ground shaking and potential secondary hazards (i.e., liquefaction and subsidence) as a result of earthquakes. The primary seismic hazard in the City is ground shaking. Ground shaking can result in partial collapse of buildings and extensive damage in poorly built or substandard structures.

The potential for soil liquefaction due to earthquakes and ground shaking is also considered a possibility in parts of Mendocino County. As discussed in the Environmental Setting section above, the potential for liquefaction does exist in Willits especially related to earthquake activity.

Based upon the seismologic and geologic conditions within the Planning Area, damage or risk due to earthquake activity is a possibility. While deep unconsolidated deposits have greater potential for stronger earthquake shaking, this great potential is recognized in the UBC and the CBC. These codes provide for more stringent earthquake resistant design parameters for such areas. Thus, while these shaking impacts are potentially more damaging, they also will tend to be reduced in their structural effects due to UBC or CBC criteria that recognize this potential. This includes provisions for buildings to structurally survive an earthquake without collapsing and includes such measures as anchoring the foundation and structural frame design.

Implementation of General Plan (1992) Safety Element policies and action items 7.250, 7.260, 7.270, 7.2800, 7.320, 7.340, and 7.350, which require geologic, seismic and soil analyses and acceptable mitigation of potential impacts for projects proposed within seismic hazard areas and with adherence to

the Safety Element (2019) goals and policies including Goal S-1 through S-1.7, as well as compliance with the UBC and CBC, would reduce potential impacts from seismic activities. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the updated seismic hazard policies of the Draft would apply to development within the City. Through the implementation of this mitigation measure, potential impacts from seismic activities would be less than significant. A less than significant impact would occur with mitigation incorporated.

MITIGATION MEASURE

GEO-1: Adopt Draft Safety Element

Prior to, or within six months following, the adoption of the Land Use Element, the City of Willits shall complete the process of updating and adopting the Draft Safety Element consistent with state law and initiate the process of putting into effect the implementation program.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant with mitigation.

Impact GEO-02: Would the Project result in substantial soil erosion or the loss of topsoil?

Subsequent land use activities associated with the implementation of the proposed Project may result in the potential improvements to existing roadways, construction of infrastructure (water and sanitary sewer facilities), and additional commercial, residential, and industrial development. The grading and site preparation activities associated with such activities would remove topsoil, disturbing and potentially exposing the underlying soils to erosion from a variety of sources, including wind and water. In addition, construction activities may involve the use of water, which may further erode the topsoil as the water moves across the ground. Please refer to Section 3.10, Hydrology and Water Quality, for further discussion regarding impacts that soil erosion and the loss of topsoil may have on surface water quality.

New development could involve paving and other site improvements, increasing the amount of impervious surfaces (incapable of being penetrated by water). These impervious surfaces generate higher levels of runoff (i.e., erosion from site preparation, sediment deposition from stormwater runoff, and automobile fluids). The Planning Area contains a large extent of existing urban uses, because of this existing urbanized development, the erosion potential is low. As future development and infrastructure projects are considered by the City, each project will be evaluated for conformance with the CBSC, the General Plan (1992) and subsequent updates, Safety Element (2019), and other relevant regulations. In addition, the City of Willits Standards (2011) requires projects that disturb one (1) acre or more to prepare and implement a SWPPP in accordance with the CGP. Additionally, projects that result in less than one (1) acre but are part of a larger common plan of development, such as the proposed Project, that totals one or more acre of land disturbance, are required to obtain coverage under the CGP. Compliance with the CGP requires that operators of such construction sites implement stormwater controls and develop a SWPPP identifying specific BMPs to be implemented to minimize the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. The CGP also requires post-construction BMPs to reduce runoff and pollutants in stormwater discharges. Subsequent discretionary development and infrastructure projects carried out by the City would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA.

The implementation of the policies and actions in the General Plan, as well as applicable state and local requirements, would lessen impacts associated with erosion and loss of topsoil. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the updated flood mitigation and climate adaptation and resiliency policies of the Draft would apply to development within the City. Through the implementation of this mitigation measure, potential impacts from soil erosion activities would be less than significant. A less than significant impact would occur with mitigation incorporated.

Mitigation Measure

Mitigation Measure GEO-1 defined above in Impact GEO-1 would be applied to ensure potential impacts associated with erosion and loss of topsoil would be less than significant during implementation of future development projects.

Significance After Mitigation

Impacts would be less than significant with mitigation.

Impact GEO-03: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Development facilitated by the Project could result in the exposure of people and structures to conditions that have the potential for adverse effects associated with ground instability or failure. As discussed under Environmental Setting, subsidence, or collapse, is not anticipated to occur within the Planning Area; however, future development may occur in areas with the potential for liquefaction, landslides, and lateral spreading. These potential issues are discussed below:

Landslide: The Planning Area is essentially flat where already developed and urbanized but the adjacent western hills may provide minor landslide potential, as described in the Environmental Setting. The potential for a landslide in the Land Use Change Areas is generally low. However, areas of moderate to high landslide susceptibility do occur in and around the city limits and SOI Area. Figures S-3a and S-3b of the Safety Element (2019), see Appendix D, illustrate the landslide potential in the vicinity of the Planning Area.

Lateral Spreading: Lateral spreading generally is a phenomenon where blocks of intact, non- liquefied soil move down slope on a liquefied substrate of large areal extent. The potential for lateral spreading is present where open banks and unsupported cut slopes provide a free face (unsupported vertical slope face). Ground shaking, especially when inducing liquefaction, may cause lateral spreading toward unsupported slopes. No lateral spreading is anticipated within the developed Land Use Change Areas; however, it may occur in portions of the SOI Area near hillsides.

Liquefaction: Liquefaction typically requires a significant sudden decrease of shearing resistance in cohesionless soils and a sudden increase in water pressure, which is typically associated with an earthquake of high magnitude. The potential for liquefaction is highest when groundwater levels are high, and loose, fine, sandy soils occur at depths of less than 50 feet. Soil data from the NRCS Web Soil Survey (NRCS 2019) suggests that the potential for liquefaction may range from low to high within the Planning Area given that many soils are high in sand and the water table is moderately high. Additionally,

liquefaction areas may also be present along water courses where similar conditions exist. As shown on Figure 4.6-3 in the Mendocino County General Plan Update Draft EIR prepared in September 2008, the area around Willits has a high quantity of alluvial deposits identified as “Liquefiable Soils.” This is figure is included in Appendix D for reference.

Conclusion: Unstable geologic units could be present within the Planning Area. As future development and infrastructure projects are considered by the City, each project would be evaluated for conformance with the CBSC, the General Plan (1992), the Safety Element (2019), and other relevant regulations. Subsequent discretionary development and infrastructure projects carried out by the City would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA. In addition to the requirements associated with the CBSC, the Willits General Plan (1992) and the Willits Safety Element (2019) includes policies and actions to ensure that development projects address potential geologic hazards, at-risk buildings and infrastructure is evaluated for potential risks, and site-specific studies are completed for area subject to liquefaction. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the updated flood mitigation and climate adaptation and resiliency policies of the Draft would apply to development within the City. Through the implementation of this mitigation measure, potential impacts from soil erosion activities would be less than significant. A less than significant impact would occur with mitigation incorporated.

Mitigation Measure

Mitigation Measure GEO-1 defined above in Impact GEO-1 would be applied to ensure potential impacts associated with ground instability and failure would be less than significant during implementation of future development projects.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Impact GEO-04: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

According to the Custom Soil Report (2023) for the Planning Area (see Appendix D), soils in the Planning Area soils vary from a low shrink-swell potential to a high shrink-swell potential. The majority of the Planning Area is depicted as not rated or not available in areas where development has already occurred, reflecting the urbanized areas of Willits. Radiating outward from the urban areas, soils are characterized as having increased shrink-swell potential ranging from low to moderate (primarily along the western side of the SOI Area) to three (3) distinct areas of high potential two (2) of which are in the southwestern portions of the SOI Area and one (1) of which is located on the west side of Sherwood Road to the north of the SOI Area. The areas with moderate to high expansive soils would require special design considerations due to shrink-swell potentials.

As future development and infrastructure projects are considered by the City, each project would be evaluated for conformance with the CBSC, and the Willits General Plan (1992). Subsequent discretionary development and infrastructure projects carried out by the City would also be analyzed for potential environmental impacts, consistent with the requirements of CEQA.

As required by the CBSC section 1803.1, where required by the City, a site-specific geotechnical investigation would identify the potential for damage related to expansive soils and non-uniformly compacted fill and engineered fill. If a risk is identified, design criteria and specification options may include removal of the problematic soils, and replacement, as needed, with properly conditioned and compacted fill material that is designed to withstand the forces exerted during the expected shrink-swell cycles and settlements.

Design criteria and specifications set forth in the design-level geotechnical investigation would ensure impacts from expansive soils are minimized. Therefore, this impact is considered less than significant.

MITIGATION MEASURE

No mitigation measures would be required.

Impact GEO-05: Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

New development facilitated by the Project would not require the use of new septic tanks or alternative wastewater disposal systems. New sources of wastewater would be discharged into the existing public sanitary sewer system, assuming the properties located within the SOI Area would be approved for annexation into the City. As described in the Regulatory Setting, new development facilitated by the Project would be required to comply with City sewer standards including the sewage disposal regulations included in the Municipal Code Title 13 Chapter 13.04, 13.08, and 13.16 that includes the requirements for the use, construction and extension, and enforcement policies of public sewers. Pursuant to Municipal Code Sections 13.04.070, 13.04.090, and 13.04.100(a) and (b), it is unlawful to construct or maintain a privy, privy vault, septic tank, cesspool, seepage pit or other facility intended or used for the disposal of sewage within the city limits (except in connection with facilities approved by the director in conjunction with construction projects or other special events). It is assumed that developed properties within the SOI Area currently dispose of wastewater via existing connections to the City wastewater system or via on-site septic systems. As the Project involves land use changes to land within the city limits currently connected to the City wastewater system and an expanded SOI Area that may facilitate future annexation of additional lands into the City, the Project would not be anticipated to facilitate development that would require new septic tanks or alternative wastewater disposal systems. No impact would occur.

MITIGATION MEASURE

No mitigation measures would be required.

Impact GEO-06: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

The existing General Plan (1992) and Mendocino County General Plan Draft EIR (2008) do not identify the presence of paleontological or unique geological features within the City or surrounding area. The Mendocino County Draft EIR (2008) identified 182 paleontological resources in Mendocino, the majority of which were found in the Coastal Zone. Regardless, due to the prevalence of paleontological resources in the subsurface, it is possible that future development activities facilitated by the Project could uncover previously unknown paleontological resources. This would be a potentially significant impact and would

require the implementation of Mitigation Measure GEO-2, below, which would require implementation of an inadvertent discovery protocol during construction. This measure would ensure unanticipated paleontological resources discovered during construction would be preserved and/or recorded consistent with appropriate laws and requirements and would reduce this impact to a less-than-significant level.

Mitigation Measure

GEO-2: Other Paleontological or Geological Resource Discover Protocols

Implementation Measure LU-7.X4 If fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), the City and its contractor shall divert construction activities away from the discovery within 50 feet of the find, and a professional paleontologist shall be contracted to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they would be properly curated and preserved.

Significance After Mitigation

Impacts would be less than significant with mitigation.

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Acronyms/Abbreviations

CBC	California Building Code
CBSC	California Building Standards Code
CCR	California Code of Regulations
DOC	California Department of Conservation
Caltrans	California Department of Transportation
DMG	California Division of Mines and Geology
CGS	California Geological Survey
CAL Green Code	California Green Building Standards Code
g	Gravity
kPa	kilopascal
IBC	International Building Code
LID	Low Impact Development
M	Magnitude
ML	Magnitude scales
MM	Modified Mercalli scale

Mw	Moment Magnitude
NPDES	National Pollutant Discharge Elimination System
NSSH	National Soil Survey Handbook
NRCS	Natural Resources Conservation Service
RUSLE2	Revised Universal Soil Loss Equation Version 2
SWRCB	State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
UBC	Uniform Building Code
DOI	U.S. Department of the Interior
USGS	U.S. Geological Survey
WWTP	Willits Wastewater Treatment Plant

3.8 GREENHOUSE GAS EMISSIONS

This chapter assesses the Greenhouse Gas (GHG) emission impacts of the proposed Land Use Element and Sphere of Influence Update. “Greenhouse gases” are so called because of their role in trapping heat near the surface of the earth; they are emitted by human activity and are implicated in global climate change. The principal GHGs which are emitted in the greatest quantities from human activities are carbon dioxide and methane. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane predominantly results from off-gassing associated with agricultural practices and landfills. Other GHGs – with much greater heat-absorption potential than carbon dioxide – include hydrofluorocarbons (HFC’s), perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes.

ENVIRONMENTAL SETTING

Since the beginning of the industrial revolution in the eighteenth century, human activities like burning fossil fuels and deforestation have caused large amounts of additional GHGs to be released into the atmosphere. Specifically, atmospheric carbon has increased from a historical range of 200–280 parts per million to over 400 parts per million during the past century. This represents an atmospheric carbon content which is higher than at any point over the past 800,000 years[1]. These additional GHGs cause more heat to be trapped in the atmosphere, and as a result, global temperatures have been rising. Anthropogenic (human- caused) climate change has been the scientific consensus for several decades, with over 97 percent of climate scientists agreeing that the planet is warming due to human activities[2].

REGULATORY SETTING

FEDERAL

The American Innovation and Manufacturing (AIM) Act of 2020 directs the federal Environmental Protection Agency (EPA) to address HFCs by providing new authorities to phase down the production and consumption of listed HFCs, manage these HFCs and their substitutes, and facilitate the transition to next-generation technologies that do not rely on HFCs[3]. On September 23, 2021, EPA issued a final rule that will phase down the U.S. production and consumption of HFCs by 85% over the next 15 years, as mandated by the AIM Act. A global phasedown of HFCs is expected to avoid up to 0.5°C of global warming by 2100.

On December 20, 2021, the EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years (MY) 2023 through 2026. The updated standards will result in avoiding more than 3 billion tons of GHG emissions through 2050. The EPA is planning to initiate a separate rulemaking to establish multi-pollutant emission standards under the Clean Air Act for MY 2027 and later will speed the transition of the light-duty vehicle fleet toward a zero-emissions future consistent with President Biden's Executive Order, "Strengthening American Leadership in Clean Cars and Trucks."

In 2015, the EPA issued a final rule establishing emission standards for GHG emissions from new fossil fuel-fired utility boilers and natural gas-fired stationary combustion turbines. Those emission limits remain in place today.

[1] https://climate.nasa.gov/evidence/ accessed October 12, 2023
[2] https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_sar_wg_I_full_report.pdf accessed October 12, 2023
[3] https://www.epa.gov/climate-change/climate-change-regulatory-actions-and-initiatives accessed October 12, 2023

In 2016, EPA finalized two rules updating both the 1996 New Source Performance Standards (NSPS) for new and modified landfills and the 1996 guidelines for existing landfills to reduce emissions of methane-rich landfill gas. EPA issued a Federal Plan implementing the 2016 emission guidelines in May 2021.

EPA is implementing CO_2 emission standards for airplanes used in commercial aviation and for large business jets. These standards are consistent with international standards set by the United Nations' International Civil Aviation Organization

STATE

California is recognized globally as a leader on climate change, having established a variety of ambitious GHG-reduction targets and associated strategies. The primary legislation that has driven statewide GHG-emissions reductions is Assembly Bill (AB) 32, Senate Bill (SB) 32, and most recently, Executive Order (EO) B-55-18. Aligning with State GHG emission reduction targets is one of the requirements of the California Environmental Quality Act (CEQA) Guidelines for streamlining.

2002 Senate Bill 1078

In 2002, Senate Bill (SB) 1078 established the California Renewables Portfolio Standards (RPS) Program which requires that 20 percent of retail electricity sales be composed of renewable energy sources by 2017 and was accelerated in 2006 by SB 107,5 which requires that 20 percent of retail electricity sales be composed of renewable energy sources by 2010, instead of 2017. EO S-14-08 was signed in 2008 to further streamline California's renewable energy project approval process and increase the state's RPS to the most aggressive in the nation requiring 33 percent renewable power by 2020.6 SB 350, discussed further below, further accelerated the program which mandated a 50% RPS by 2030.

2002 Assembly Bill 1493

In 2002, Assembly Bill (AB) 1493, also known as the Pavley Regulations, directed the California Air Resources Board (CARB) to establish regulations to reduce GHG emissions from passenger vehicles to the maximum and most cost-effective extent feasible. CARB approved the first set of regulations to reduce GHG emissions from passenger vehicles in 2004, with the regulations initially taking effect with the 2009 model year.

2005 Executive Order S-3-05

Executive Order (EO) S-3-05 was signed in 2005, establishing statewide GHG emissions reduction targets for the years 2020 and 2050. The EO calls for the reduction of GHG emissions in California to 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050. The 2050 emission reductions target would put the state’s emissions in line with the worldwide reductions needed to reach long- term climate stabilization as concluded by the United Nations Intergovernmental Panel on Climate Change (IPCC) 2007 Fourth Assessment Report.

2006 Assembly Bill 32

California’s major initiative for reducing GHG emissions is outlined in AB 32, the “California Global Warming Solutions Act of 2006,” which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHG emissions to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions.

Based on this guidance, CARB approved a 1990 statewide GHG baseline and 2020 emissions limit of 427 million metric tons of CO2 equivalent (MMT CO2e). The Scoping Plan was approved by CARB on

December 11, 2008, and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards,7 and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2014 Scoping Plan update defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 statewide goals. The update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the state's longer-term GHG reduction strategies with other state policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use.

In December 2017, CARB adopted an updated 2017 Scoping Plan, which provides a framework for achieving the 2030 goal set by SB 32. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently approved legislation, such as SB 350 and SB 1383.

The 2017 Scoping Plan also placed an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2014 Scoping Plan Update, the 2017 Scoping Plan did not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with statewide per capita goals of reducing GHG emissions by six metric tons of carbon dioxide or equivalent GHG's (MT CO2e) by 2030 and two MT CO2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (i.e., city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the state.

CARB recently published the 2022 Scoping Plan Update which assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. It also sets a more aggressive goal to reduce carbon emissions by 48% below 1990 levels in 2030 – this represents an 8% increase from the current SB 32 target of a 40% reduction.

The Plan stresses that local government action and leadership is critical to implementing the State's climate goals including local GHG reduction strategies adopted as mitigation through review of projects.

The Plan encourages local jurisdictions to: (1) develop climate action plans, sustainability plans, or GHG reduction plans; (2) establish GHG reduction targets; (3) implement mitigation to reduce GHG emissions associated with discretionary projects (whether local, off-site mitigation or carbon offset credits), and (4) leverage regional collaboration to enhance the effectiveness of local climate action and overcome barriers to GHG mitigation.

The Plan identifies three priority areas for local governments as they develop their local climate plans, measures, policies, and actions. Those priority areas include electrification of transportation, reducing vehicle miles travelled (VMT) and decarbonization of buildings. The Plan compiles a non-exhaustive list of impactful GHG reduction strategies that local jurisdictions may implement.

To address all remaining GHG emissions that cannot be completely eliminated, the Plan contemplates both carbon capture and sequestration (CCS) projects as well as mechanical and nature-based carbon removal systems. The Plan also highlights direct air capture projects where CO2 is removed from the ambient air through different mechanical technologies, such as chemical scrubbing and mineral carbonation, or natural processes. It also discusses the importance of conserving resource lands used for agriculture and forestry and open space for public recreation. The Plan is important to local public agencies because it can be used as a resource to guide agencies in analyzing and reducing GHG emissions in CEQA documents and encouraging other local actions to meet statewide targets.

2007 Executive Order S-1-07

Also known as the Low Carbon Fuel Standard, EO S-1-07, issued in 2007, established a statewide goal that requires transportation fuel providers to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. EO S-1-07 was readopted and amended in 2015 to require a 20 percent reduction in carbon intensity by 2030, the most stringent requirement in the nation. The new requirement aligns with California's overall 2030 target of reducing climate changing emissions 40 percent below 1990 levels by 2030, which was set by SB 32 and signed by the governor in 2016.

2007 Senate Bill 97

Signed in August 2007, SB 97 acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Natural Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

2008 Senate Bill 375

SB 375, signed in August 2008, enhances the state's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035.

2009 California Green Building Code

The California Green Building Standards Code (CALGreen) is Part 11 of the California Building Standards Code or Title 24 and is the first statewide "green" building code in the nation. The purpose of CALGreen is to improve public health, safety, and general welfare by enhancing the design and construction of buildings. Enhancements include higher energy efficiency, better air quality, and improved daylighting. The first CALGreen Code was adopted in 2009 and contained only voluntary measures. Many of the original voluntary green building standards became mandatory in the 2010 CALGreen edition, which went into effect in January 2011. Between 2011 and 2023, continuous updates and additions have been made to CALGreen, including water conservation and recycling, electric vehicle infrastructure and charging and changes to align with the Energy Code. The CALGreen Code will have subsequent, and continually more stringent, updates every three years.

2011 Senate Bill 2X

In 2011, SB 2X was signed, requiring California energy providers to buy (or generate) 33 percent of their electricity from renewable energy sources by 2020.

2014 Assembly Bill 1826

AB 1826 was signed in 2014 to increase the recycling of organic material. GHG emissions produced by the decomposition of these materials in landfills were identified as a significant source of emissions contributing to climate change. Therefore, reducing organic waste and increasing composting and mulching are goals set out by the AB 32 Scoping Plan. AB 1826 specifically requires jurisdictions to establish organic waste recycling programs by 2016, and phases in mandatory commercial organic waste recycling over time.

2015 Senate Bill 350

SB 350, the Clean Energy and Pollution Reduction Act of 2015, has two objectives: to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by 2030 and to double the energy efficiency of electricity and natural gas end users through energy efficiency and conservation.

2015 Executive Order B-30-15

EO B-30-15 was signed in 2015, establishing an interim GHG emissions reduction target to reduce emissions to 40 percent below 1990 levels by 2030. The EO also calls for another update to the CARB Scoping Plan to provide a pathway to achieve this goal.

2016 Senate Bill 32

In September 2016, the governor signed SB 32 into law, extending AB 32 by requiring the state to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged).

2016 Senate Bill 1383

Adopted in September 2016, SB 1383 requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. SB 1383 requires achievement of the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

SB 1383 also requires CalRecycle, in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills. SB 1383 further requires 20% of edible food disposed of at the time to be recovered by 2025.

2018 Senate Bill 100

Adopted in September 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the state's RPS Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

2018 Executive Order B-55-18

In September 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

2022 California Climate Crisis Act

This bill, the California Climate Crisis Act (AB 1279), declared that the policy of the state is to achieve net zero greenhouse gas emissions as soon as possible, but no later than 2045, and achieve and maintain net negative greenhouse gas emissions thereafter, and to ensure that by 2045, statewide anthropogenic greenhouse gas emissions are reduced to at least 85% below the 1990 levels.

REGIONAL AND LOCAL

The Mendocino County Air Quality Management District (MCAQMD) includes on their website a document titled, "*Adopted Air Quality CEQA thresholds of significance – June 2, 2010*" that specifies thresholds expressed in Metric Tons of CO_2e/year for determining whether a project will have a significant impact on the environment. A Mitigated Negative Declaration for a recently approved General Plan amendment in Willits used these thresholds to determine a less than significant GHG emissions impact for that project[4].

However, a more recent 2013 document on the MCAQMD website states, "(the District) has not adopted GHG or Risk Reduction Plans using CEQA, therefore no local projects can use those documents to support a CEQA determination." [5] Accordingly, the analysis in this EIR does not rely on the thresholds of significance provided by the MCAQMD on their website.

IMPACT ANALYSIS

This section describes the methodology and standards of significance utilized to analyze and determine the proposed Project's potential impacts related to GHG emissions.

SIGNIFICANCE THRESHOLDS

Based on Appendix G of the CEQA Guidelines the proposed Land Use Element and Sphere of Influence Update would have a significant impact if it would:

a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG.

METHODOLOGY

The proposed Project involves expanding the land use supply for mixed-use growth in the City of Willits along with modifications to the general plan goals and policies to support that growth in a sustainable form. The Project is described earlier in this EIR and is intended to increase opportunities for where and what type of growth can occur in the city without affecting the current general plan's expected buildout population of 7,500 persons.

[4] Willits Unified School District General Plan Amendment And Rezone, https://ceqanet.opr.ca.gov/Project/2020070033 accessed October 12, 2023
[5] https://www.co.mendocino.ca.us/aqmd/pdf_files/ceqa-criteria-and-ghg.pdf accessed October 12, 2023

The Impacts and Mitigation section reviews the project to determine how it would affect future GHG emissions and how it would align with GHG reduction plans based on the following factors:

- The Project's GHG emissions analysis considers how the potential land use and policy changes of the proposed project will influence overall GHG emissions in the city.
- For the impacts on other GHG emission reduction plans, the analysis focuses on whether the project would be consistent with statewide GHG emission reduction goals.

PROJECT IMPACTS AND MITIGATION

This section discusses potential impacts associated with the proposed Project and provides mitigation measures where necessary.

Impact GHG-01: The proposed project will result in development that may generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment even with the mitigation measures described below, resulting in a significant, unavoidable impact.

The City (and Sphere of Influence) is planned to expand to create more opportunity sites for expected growth. The city will remain relatively compact with existing development and new growth concentrated in an area of approximately 2.5 by 3 miles. The proposed Land Use Element changes are intended to stimulate higher density residential and commercial development within infill areas in the city, and the proposed Sphere of Influence changes are intended to facilitate future annexation, as needed, of adjacent areas into the city with commensurate increases in the allowed density and intensity of land uses in these areas. Accordingly, new development under the Project is expected to be more focused and concentrated because there will be more opportunities for new development to occur within and adjacent to the city.

In many ways, the GHG emissions resulting from construction of new homes and businesses within the Planning Area under the proposed Project is expected to be about the same as under the current General Plan and Sphere of Influence. This is because the construction techniques and materials are assumed to be similar whether that construction occurs in a more compact form under the Project or in a more dispersed manner that would occur under existing conditions.

Also, the GHG's emitted during the use of individual homes and businesses is expected to be about the same under the Project as under current conditions because the same energy efficiency standards will be applied through the building permit approval process so the GHG's emitted to heat, cool and power homes and businesses will be similar. The GHG's emitted during construction is also expected to be similar whether the home or business occurs close to existing services under the Project or in a more dispersed manner that would occur under existing conditions.

Compared to current conditions the Project is likely to reduce the GHG emissions associated with transportation of goods and services into and out of the newly developed areas. This is because of its focus on encouraging higher density residential and mixed-use projects in areas close to existing population and employment centers. Chapter 4.17 of this EIR documents the transportation impacts of the proposed Project and concludes vehicle trips generated under the Project are expected to be shorter in length compared current conditions which means less gasoline and diesel will be used in transportation supporting residents and businesses in the Planning Area resulting in fewer GHG emissions.

Specifically, Chapter 4.17 states, "(a)ttracting growth to the city and adjacent to the city instead of outlying unincorporated areas of the county could reduce future (Vehicle Miles Travelled or "VMT") growth in the region." The discussion in Chapter 4.17 goes on to surmise that even lower vehicle use rates and corresponding lower gasoline and diesel energy use are possible due to the proposed Project's policy changes that support infill and mixed-use growth and improved active transportation conditions including LU-2.2 Infill Development and LU-3.1 Complete Streets and several others. Lower amounts of gasoline and diesel used in transportation under the Project are expected to reduce GHG emissions compared to current conditions.

Other policies in the proposed Land Use Element may also reduce GHG emissions from the Project. Policy LU-3.8 *Energy Conservation and Reduction e*ncourages the installation of renewable energy systems and community-wide reductions in energy consumption which will reduce GHG emissions associated with energy use. Policy LU-3.9 *Plan for Climate Change* directs the City to develop and implement programs to achieve City-wide reductions in greenhouse gas emissions, and Policy LU-3.10 *Greenhouse Gas Emission Reductions* directs the City to evaluate new larger-scale residential, commercial, and industrial projects for compliance with state regulations and require feasible mitigation measures to reduce GHG emissions.

Implementing the policies and other actions of the Project encouraging infill and mixed use will help reduce GHG emissions from the future development it is intended to stimulate. Additional GHG emission reductions could be achieved by actions that the City may take in the future as directed by Policy LU-3.9 which will implement programs to achieve City-wide reductions in greenhouse gas emissions[6].

Statewide goals for GHG emissions reductions are measured in metric tons of CO_2 reductions or equivalent (CO_2e). The approach many communities use to assess the impact of projects on GHG emissions involves quantitative analysis and comparison to the State's goals. Specific information about GHG emissions from future development projects resulting from the Project are unknown at this time and GHG emission reduction measures developed through Policy LU-3.9 are yet-to-be developed so it is uncertain how much GHG emissions will result from the Project.

CEQA requires public agencies to identify the potentially significant effects on the environment of projects they intend to carry out or approve, and to mitigate significant effects whenever it is feasible to do so. AB 32 establishes by law that GHG emissions cause significant adverse impacts to the environment, so this impact is conservatively determined to be significant. Ensuring that the Project's GHG emissions will be mitigated through programs reducing emissions is not feasible at this time. Therefore, this impact is considered significant and unavoidable.

MITIGATION MEASURE

GHG-1 Revise Policy LU-3.9 *Plan for Climate Change*

Revise Policy LU-3.10 Plan for Climate Change. Plan for the public health implications of climate change, including potential disease and temperature effects, and work with state and county public health agencies to identify necessary programs to reduce, adapt to, and increase resiliency to potential impacts and develop and implement programs to achieve City-wide reductions in greenhouse gas emissions consistent with state targets.

[6] The 2022 Scoping Plan Update published by CARB has an extensive toolkit that may be useful in helping the City develop those programs.

SIGNIFICANCE AFTER MITIGATION

Impacts would continue to be significant and unavoidable after mitigation.

Impact GHG-01: The proposed project may conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG, resulting in a significant, unavoidable impact.

New development under the Project is expected to be more focused and concentrated than under current conditions because there will be more opportunities for new development to occur within and adjacent to the city. Compared to current conditions the Project is likely to reduce the GHG emissions associated with transportation of goods and services into and out of the newly developed areas.

Other policies in the proposed Land Use Element may also reduce GHG emissions from the Project. Policy LU-3.8 Energy Conservation and Reduction encourages the installation of renewable energy systems and community-wide reductions in energy consumption which will reduce GHG emissions associated with energy use. Policy LU-3.9 Plan for Climate Change directs the City to develop and implement programs to achieve City-wide reductions in greenhouse gas emissions, and Policy LU-3.10 Greenhouse Gas Emission Reductions directs the City to evaluate new larger-scale residential, commercial, and industrial projects for compliance with state regulations and require feasible mitigation measures to reduce GHG emissions. Following through with the policies and other actions of the Project encouraging infill and mixed use will help reduce GHG emissions from the future development it is intended to stimulate.

These reductions in GHG emissions may be partially or entirely offset by other aspects of the Project that generate GHG emissions. For example, the GHG emissions associated with new construction under the Project will involve construction techniques and materials that will likely be similar to new construction under current conditions because there would be no difference whether that construction occurs in a more compact form under the Project or in a more dispersed manner that would occur under existing conditions. Also, the GHG's emitted during the use of individual homes and businesses is expected to be about the same under the Project as under current conditions because the same energy efficiency standards will be applied through the building permit approval process so the GHG's emitted to heat, cool and power homes and businesses will be similar.

The state's current goal for GHG emission reduction is described in the 2022 Scoping Plan Update: reduce GHG emissions to 85 percent below 1990 levels by 2045[7]. Determining whether a project is consistent with this goal involves quantitative analysis of GHG emissions and comparison to the State's goals.

Quantitative information about GHG emissions from future development projects resulting from the Project are unknown at this time and GHG emission reduction measures developed through Policy LU-3.9 are yet-to-be developed so it is uncertain how much GHG emissions will result from the Project and whether those emissions are consistent with or conflict with the targets established in the state's 2022 Scoping Plan. Accordingly, this impact is conservatively determined to be significant. Developing

[7] https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan accessed October 13, 2023.

mitigation measures to ensure the Project's GHG emissions will be consistent with state targets is not feasible at this time. Therefore, this impact is considered significant and unavoidable.

Mitigation Measures

See Mitigation Measure GHG-1.

Significance After Mitigation

Impacts would continue to be significant and unavoidable after mitigation.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Hazards include man-made or natural materials or conditions that may pose a threat to human health, life, property, or the environment. Hazardous materials and waste present health hazards for humans and the environment. These health hazards can result during the manufacture, transportation, use, or disposal of such materials if not handled properly. In Willits, hazards to humans can also occur from natural or human induced wildfire and air traffic accidents.

This section describes the potential hazards and hazardous materials impacts associated with the proposed General Plan Land Use Element and Sphere of Influence Updates (Project). This section describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential hazards and hazardous materials impacts, and identifies policies that could minimize potentially significant impacts. A discussion of wildland fire hazards is provided in Section 3.19, Wildfire.

ENVIRONMENTAL SETTING

Hazardous Materials

A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may either (1) cause or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating irreversible illness; or (2) pose a substantial present or potential hazard to human health and safety, or the environment when improperly treated, stored, transported, or disposed of. Hazardous materials are mainly present because of industries involving chemical byproducts from manufacturing, petrochemicals, and hazardous building materials.

The transportation of hazardous materials within California is subject to various federal, state, and local regulations. It is illegal to transport explosives or inhalation hazards on public highways not designated for that purpose, unless the use of the highway is required to permit delivery, or the loading of such materials (California Vehicle Code §§ 31602(b), 32104(a)). The California Highway Patrol (CHP) designates through routes to be used for the transportation of hazardous materials. Major transportation routes that connect to Willits include US Highway 101 (north/south) and State Highway 20. These two (2) roadways are considered truck routes by the State of California by which a variety of chemicals and products are conveyed through the region. As discussed in Section 4.13 Noise, the Skunk Train runs through the redwood forest to provide passenger travel from depots in Willits and Fort Bragg, California. Accidents releasing hazardous materials or wastes may occur along these roadways and/or rail lines but can also happen on local roads that lead to these regional connectors. Regulation of the use, storage, and transportation of hazardous materials and wastes rests on state and federal agencies; however, cities play a large role in minimizing the risks and impacts of exposure through careful planning and preparation. A critical element that assists with limiting exposure to Willits residents and businesses is the US Highway 101 bypass route, which diverts north/south bound traffic around the Willits central business district.

Hazardous Waste

Hazardous waste is the subset of hazardous materials that has been abandoned, discarded, or recycled and is not properly contained, including soil or groundwater that is contaminated with concentrations of chemicals, infectious agents, or toxic elements sufficiently high to increase human mortality or to destroy the ecological environment. If a hazardous material is spilled and cannot be effectively picked up and used as a product, it is considered to be hazardous waste. If a hazardous material site is unused, and it

is obvious there is no realistic intent to use the material, it is also considered to be a hazardous waste. Examples of hazardous materials include flammable and combustible materials, corrosives, explosives, oxidizers, poisons, materials that react violently with water, radioactive materials, and chemicals.

Hazardous Sites

Cortese List

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the state, local agencies, and developers to comply with CEQA requirements by providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency (Cal/EPA) to develop an updated Cortese List at least annually. The Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

EnviroStor

The DTSC maintains the EnviroStor Data Management System, which provides information on hazardous waste facilities (both permitted and corrective action) as well as available site cleanup information. This site cleanup information includes: Federal Superfund Sites on the National Priority List (NPL), State Response Sites, Voluntary Cleanup Sites, School Cleanup Sites, Corrective Action Sites, Tiered Permit Sites, and Evaluation / Investigation Sites. The hazardous waste facilities include Permitted–Operating, Post- Closure Permitted, and Historical Non-Operating. As provided in Table 3.9a there are ten (10) locations with a Willits address that are listed in the EnviroStor database.

Table 3.9a: DTSC EnviroStor Sites with a Willits Address

Name	Envirostor ID	Status	Location
Abex Corporation	23340001	Refer: RWQCB	South Main Street
Advanced manufacturing & Development, Inc.	71003003	Inactive – Needs Evaluation	300 E. Hill Road
Berglund Caterpillar Tractor	23350002	Refer: RWQCB	1600 S Main
Harwood Products	23240007	Refer: RWQCB	P.O. Box 609
Little Lake Industries	23240004	Refer: RWQCB	300 East Commercial
Louisiana-Pacific Corp – Willits	23240010	Refer: RWQCB	25500 North Highway 101
Microphor, Inc.	23360001	Refer: RWQCB	452 E. Hill Road
T&T Auto Wreckers & Mini-Storage	23500012	Refer: RWQCB	277 N Lenore Ave.
Union Oil	23510002	Refer: RWQCB	229 E San Francisco Ave.
Wilson Page Septic Service	23470001	Refer: RWQCB	4280 Canyon Road 3 Mi. NE of Willits

Source: DTSC 2023.

GeoTracker

GeoTracker is the State Water Resources Control Board's (SWRCB) data management system for managing sites that impact groundwater, especially those that require groundwater cleanup (Underground Storage Tanks (USTs), Department of Defense, Site Cleanup Program) as well as permitted facilities such as operating USTs and land disposal sites.

The listing of status types is the mechanism by which the SWRCB identifies its involvement at each site, the status of cleanup activities, and whether the cleanup is active or complete. Status types are also an important tool for jurisdictions to understand where there are sites actively undergoing cleanup of a hazardous material that may pose a hazard to the public or the environment. Status types that identify active and ongoing cleanup activities include (SWRCB 2023):

- Completed – Case Closed: A closure letter or other formal closure decision document has been issued for the site.
- Open – Assessment & Interim Remedial Action: An "interim" remedial action is occurring at the site AND additional activities such as site characterization, investigation, risk evaluation, and/or site conceptual model development are occurring.
- Open – Inactive: No regulatory oversight activities are being conducted by the Lead Agency.
- Open – Remediation: An approved remedy or remedies has/have been selected for the impacted media at the site and the responsible party (RP) is implementing one or more remedies under an approved cleanup plan for the site. This includes any ongoing remedy that is either passive or active, or uses a combination of technologies. For example, a site implementing only a long-term groundwater monitoring program, or a monitored natural attenuation (MNA) remedy without any active groundwater treatment as part of the remedy, is considered an open case under remediation until site closure is completed.
- Open – Site Assessment: Site characterization, investigation, risk evaluation, and/or site conceptual model development are occurring at the site. Examples of site assessment activities include, but are not limited to, the following: 1) identification of the contaminants and the investigation of their potential impacts; 2) determination of the threats/impacts to water quality; 3) evaluation of the risk to humans and ecology; 4) delineation of the nature and extent of contamination; 5) delineation of the contaminant plume(s); and 6) development of the Site Conceptual Model.

The following three (3) tables (4.9-2 to 4.9-4) contain information sourced from the SWRCB GeoTrakcer database and include the identification, status, and location of leaking USTs (LUSTs), permitted UST, and designated clean-up sites with Willits addresses.

Leaking Underground Storage Tanks (LUST)

There are 55 locations with a Willits address that are listed in the GeoTracker database for LUSTs. Of the sites identified, 54 of the locations have undergone LUST cleanup and the SWRCB has listed them as "Completed – Case Closed". The remaining site is listed as "Open - Site Assessment". Table 3.9b lists the name and location for LUSTs in Willits.

Table 3.9b: GeoTracker LUST Sites with a Willits Address

Site Name	Location
Completed – Case Closed	
Abex Corporation - Remco Hydraulics / Former Luna Market	934 Main Street, South
Alliance Self Service	1 Main Street, North
Berglund, Inc.	1600 Main Street, South
Blaze Chevrolet-Pontiac	1565 Main Street, South
BP, Rinehart	1579 Main Street, South
Brooktrails Community Service District	24860 Birch Street
Browns Corner	1799 South Main Street
California Street, Willits	349 Main Street, South
CDF Howard Forest Fire Station	17501 Highway 101, North
CDF Mendocino Ranger Headquarters	17501 Highway 101, North
CDOT Willits Maintenance Station	21340 Baechtel Road
Chevron #9-6188	2 Main Street, North
Chevron #9-9897, Coffman's	811 Main Street, South
Cutter Lumber Products	1800 Highway 20
Dockins Trucking	1201 Blosser Lane, South
Exxon, North Willits	310 Main Street, North
Food & Liquor #166	180 Main Street, North
Granite Construction Co / Longvale Hot Plant	35510 Covelo Road
Harrah Lumber Company	351 Franklin Avenue
Harrah Marital Trust	351 Franklin Street
Little Lake Industries South	300 Commercial Street, East
Main Street 76	898 Main Street, South
MCDPW Willits Road Yard	751 Hearst Willits Road
McQuiston, Bill & Virginia	25235 Perch Way
Mendocino Forest Products - Willits	25500 Highway 101, North
Noyo Theater	57 Commercial Street, East
Page Residential Tank	4280 Canyon Road
PG&E Willits	1601 Baechtel Road
Private Residence	Private Residence
Private Residence	Private Residence
Private Residence	Private Residence
R & J Lumber	1150 Blosser Lane
Redwood Oil, Willits	110 Main Street, North
Romero, Ed	2342 Goose Road
SBC Facility Laughlin Ridge Repeater Station	Ridgewood Drive
SBC Facility Willits	202 Madden Street
Sedain, Bob & Barbara	1593 Castell Drive
Shuster's Transportation	750 Valley Street, East

Site Name	Location
Completed – Case Closed	
Shuster's Willits Ready Mix	1660 Center Valley Road
Tesoro #67118	1250 Main Street, South
Texaco	788 Main Street, South
Texaco, Ridge	16540 Highway 101, North
Texaco, Willits South	781 Main Street, South
Villanova, Remo	425 Main Street, South
Whitney Property	96 Humboldt Street
Willits Airport, Ells Field	1320 Poppy Drive
Willits Automotive	335 Main Street, South
Willits Corp Yard Waste Oil Tank	380 Commercial Street, East
Willits Environmental Center	316 Main Street, South
Willits High School - ROP	249 Main Street, North
Willits Service Station (Former)	101 Main Street, North
Willits, City of, Police Department	82 Commercial Street, East
Willits, City, Corporation Yard	380 Commercial Street, East
Woodland Investors	31400 Big Trails Drive
Open – Site Assessment	
Persico Fossil Fuel	288 Shell Lane

Source: SWRCB 2023.

Permitted Underground Storage Tank (UST)

There are 11 locations with a Willits address that have USTs that are permitted through the SWRCB. Table 3.9c lists the name and location of the 11 permitted USTs in Willits.

Table 3.9c: Permitted UST Sites with a Willits Address

Site Name	Location
AT&T California - TD121	16121 N Highway 101
AT&T California - TDU16	202 Madden St
Browns Corner	1799 S Main St
Flyers #224	1250 S. Main St.
North Willits Patriot	310 N Main St
Pacific Pride	251 Shell Ln
Safeway Fuel Center #965-1	811 S Main St
Village Market 2	180 N Main St
Willits Arco	898 S Main St
Willits Chevron	781 S. Main St.
Willits Sinclair	1579 S Main St

Source: SWRCB 2023.

Water Board Program Cleanup Sites

There are 18 locations with a Willits address that are listed in the GeoTracker database for Water Board Cleanup Sites. Of the 18 locations identified, 11 have undergone cleanup and the state has closed the case. There are seven (7) locations in Willits with open cases. Table 3.9d lists the location of open and closed cases for Water Board Program Cleanup Sites with a Willits address.

Table 3.9d: GeoTracker Cleanup Sites

Site Name	Location
Completed – Case Closed	
Abex Corp/Remco Hydraulics	475 San Francisco Street, East
Alecksick, Mary A.	530 Central Street
Granite Construction / Longvale Hot Plant (Truck Tank)	35510 Covelo Road
Liquid Transfer LLC	N/A Highway 20 @ MP 21.61
Little Lake Industries (100 Lenore)	100 Lenore Avenue, North
Mendocino Forest Products - Willits	25500 Highway 101
North Coast Railroad Authority - Willits Rail Yard	239 Commercial Street, East
Page Pits	3920 Canyon Road
Ramos-Thibault Corp	300 East Hill Road
Redwood Oil Co - Tanker Spill	Highway 20, PM 30.88
Safeway Willits	811 Main Street, South
Open - Inactive	
Foster, John	266 Shell Lane
Willits, City, Recreation Area	Commercial Street, East
Open - Remediation	
Abex Corporation - Remco Hydraulics	934 Main Street, South
Microphor, Inc.	452 Hill Road, East
Redwood Empire Cleaners	69 Mendocino Avenue, West
Open – Assessment & Interim Remedial Action	
Hearst Road Diesel Spill	7501 Hearst Road
Open – Site Assessment	
Peters & Garman	266 Shell Lane

Source: SWRCB 2023.

Waste Disposal Facilities

The Solid Waste Information System (SWIS) is a database of solid waste facilities that is maintained by the California Department of Resources Recycling and Recovery (CalRecycle). The SWIS data identifies active, planned, and closed sites. Willits has six (6) solid waste facilities listed in the database, five (5) sites are listed as closed with various permitting statuses including pre-regulation, unpermitted, and permitted (defined below) with one (1) site, Willits Solid Waste Transfer and Recycling Center listed as active and permitted. The site details are listed in Table 3.9e, below.

- Permitted: A regulatory status for a facility or site that holds or has held a solid waste facilities permit [27 CCR 21570, 14 CCR 18104 et seq.].

- Pre-Regulation: A regulatory status used for those disposal sites that ceased operations prior to August 15, 1977, when solid waste facilities permits were required.
- Unpermitted: A regulatory status for a site that never had or does not have a solid waste facilities permit. If there is an activity that requires a solid waste facilities permit and a new solid waste facilities permit has not been granted, the site or activity is considered unpermitted. In addition, if a "new" activity commences that needs to be described in an amendment to the facility's Report of Facility Information (RFI) and/or needs to be incorporated into a modified or revised solid waste facilities permit, then this "new" activity is considered unpermitted. This status includes "illegal site" as defined in 14 CCR 18011(a)(11)

Table 3.9e: Solid Waste Facilities with a Willits Address

Site Name	Location
Closed - Pre-regulation	
Lp Willits WWDS #1	3 Mi N of Willits on E Side of Hwy 101
Closed - Unpermitted	
Page Ranch Dump	111 E Commercial St
Closed - Permitted	
Lp Willits WWDS #2	3 Mi N of Willits on Hwy 101, W of Mills
Lp Willits WWDS #3	3 Mi N of Willits, W of 101, Small Fill
Lp Willits WWDS #4	3 Mi N of Willits on Hwy 101
Active - Permitted	
Willits Solid Waste Transfer & Recycling Center	350 Franklin Avenue

Source: CalRecycle 2023.

Hazards From Air Traffic

The California Department of Transportation (Caltrans) Division of Aeronautics has compiled extensive data regarding aircraft accidents around airports in California. This data is much more detailed and specific than data currently available from the Federal Aviation Administration (FAA) and the National Transportation Safety Board (NTSB). According to the California Airport Land Use Planning Handbook (2011), 21 percent of general aviation accidents occur during takeoff and initial climb and 44.2 percent of general aviation accidents occur during approach and landing. The Caltrans Division of Aeronautics has plotted accidents during these phases at airports across the country and has determined certain theoretical areas of high accident probability.

As nearly half of all general aviation accidents occur in the approach and landing phases of flight, considerable work has been done to determine the approximate probability of such accidents. Nearly 77 percent of accidents during this phase of flight occur during touchdown onto the runway or during the roll-out. These accidents typically consist of hard or long landings, ground loops (where the aircraft spins out on the ground), departures from the runway surface, etc. These types of accidents are rarely fatal and often do not involve other aircraft or structures. Commonly these accidents occur due to loss of control on the part of the pilot and, to some extent, weather conditions. (Caltrans Division of Aeronautics, 2011).

The remaining 23 percent of accidents during the approach and landing phase of flight occur as the aircraft is maneuvered towards the runway for landing, in a portion of the airspace around the airport commonly called the traffic pattern. Common causes of approach accidents include the pilot’s misjudging

of the rate of descent, poor visibility, unexpected downdrafts, or tall objects beneath the final approach course. Improper use of rudder on an aircraft during the last turn toward the runway can sometimes result in a stall (a cross-control stall) and resultant spin, causing the aircraft to strike the ground directly below the aircraft. The types of events that lead to approach accidents tend to place the accident site fairly close to the extended runway centerline. The probability of accidents increases as the flight path nears the approach end of the runway. (Caltrans Division of Aeronautics, 2011).

According to aircraft accident plotting provided by the Caltrans Division of Aeronautics (2002), most accidents that occur during the approach and landing phase of flight occur on the airport surface itself. The remainder of accidents that occur during this phase of flight are generally clustered along the extended centerline of the runway, where the aircraft is flying closest to the ground and with the lowest airspeed. Additionally, nearly 65 percent of all accidents during the takeoff and departure phase of flight occur during the initial climb phase, immediately after takeoff. This data is correlated to two (2) physical constraints of general aviation aircraft (Caltrans Division of Aeronautics, 2002):

- The takeoff and initial climb phase are times when the aircraft engine(s) is under maximum stress and is thus more susceptible to mechanical problems than at other phases of flight; and
- Average general aviation runways are not typically long enough to allow an aircraft that experiences a loss of power shortly after takeoff to land again and stop before the end of the runway.

Ells Field also known as Willits Municipal Airport is owned and operated by the City of Willits and maintains a FAA location identifier (LID) of O28. The approximately 75-acre airport is located within an island area of the Willits city boundary of the same size and adjacent to the community of Brooktrails at 1320 Poppy Drive on the mountain plateau three miles north of the main city limits. The runways, designated as runway 16 and runway 34, are each 3,000 feet long and 75 feet wide with improved asphalt surfaces. Planned improvements for the airport include the extension of the runway 1,000 feet south. Primary takeoff is downslope with primary landing is upslope. Based on the current 1996 Mendocino County Airport Comprehensive Land Use Plan, annual aircraft operations In 1996 averaged approximately 13,000 landing and/or takeoffs per year (MCACLUP 1996).

According to the NTSB Aviation Accident Database (2022,), ten (10) aircraft accidents have occurred at the Ells Field Airport since 1966. The earliest record indicates that an aircraft accident occurred July 4, 1966 (no injury). The most recent incident occurred July 4, 2017 (minor injury). Out of the ten recorded aircraft accidents at the airport since 1966, none were fatal (NTSB, 2022).

Fire Hazards

The City of Willits, like all cities within Mendocino County, is at risk of suffering substantial damage caused by a fire. As discussed in Section 4.14 Noise, the Skunk Train runs through the redwood forest to provide passenger travel from depots in Willits and Fort Bragg, California. According to the Draft Willits General Plan Safety Element Update (Safety Element, 2019), a key concern for the community is the initiation of fires associated within the operation of this rail line; on average, three (3) to five (5) fire incidents occur per year within the railroad right of way. Given the proximity of this right of way to natural areas, this facility could potentially contribute to increased fire risk within the City and region.

Wildfires are a common type of natural hazard in California and can burn large areas of undeveloped or natural land in a short amount of time. The recent trend toward more prolonged periods of drought increases the likelihood of wildfires occurring. Areas where human (development) encroaches into natural

areas is called the wildland-urban interface (WUI), which is considered an area with a high and very high fire hazard severity zone (VHFHSZ), as defined by the California Department of Forestry and Fire Protection (CAL FIRE).

State Board of Forestry and Fire Protection classifies lands within the state for the purpose of determining areas in which the financial responsibility of preventing and suppressing fires is primarily the responsibility of the state, referred to as State Responsibility Area (SRA) and classifies other areas such as incorporated cities, urban regions, and agriculture lands as Local Responsibility Area (LRA) and federal lands as Federal Responsibility Area (FRA). The City if Willits and most of the Little Lake Valley east of the City is LRA. CAL FIRE mapping of Fire Hazard Severity Zone (FHSZ) shows most of the City of Willits as within the WUI, and as classified as moderate and high FHSZs (these are recommended FHSZs within LRA and not regulatory) and shows a portion of the City of Willis incorporated island that comprises the City-owned Morris Reservoir dam as very high FHSZ. The majority of the proposed Sphere of Influence (SOI) Area is within the SRA and classified as within moderate or high FHSZs. Figure 4.19a identify the FHSZs within the Planning Area. Areas within the very high FHSZ are of primary importance to the City. The City's surface water treatment plant contains Very High and Moderate Fire Hazard Severity areas and the airport is mostly classified as High but also contains Very High Fire Hazard Severity areas. According to the Draft Safety Element (2019), the airport serves as a key evacuation location for residents in the Brooktrails area and may be critical to effective response and recovery to a regional disaster situation. CAL FIRE typically uses the airport during a significant regional wildfire event.

REGULATORY SETTING

FEDERAL

United States Environmental Protection Agency (EPA)

The EPA regulates chemical and hazardous materials use, storage, treatment, handling, transport, and disposal practices. The agency protects workers and the community (along with California Occupational Safety and Health Administration [Cal/OSHA], see below), integrating the federal Clean Water Act (CWA) and Clean Air Act (CAA) into California Legislation.

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

Adopted in 1980, CERCLA was developed to remove contamination of water, air, and land resources from past chemical disposal practices. Also known as the "Superfund Act," CERCLA contains a list of sites referred to as Superfund sites, where there is an imminent threat to human health. CERCLA collects taxes from the chemical and petroleum industries to clean abandoned or uncontrolled hazardous sites using short-term and long-term responses techniques.

The Resources Conservation and Recovery Act (RCRA)

The RCRA regulates hazardous wastes with a 'cradle-to-grave' approach, meaning that all hazardous wastes are tracked and strictly regulated from generation to disposal, and waste generators are required to report use or transport of hazardous wastes to the EPA. Hazardous waste generators range from small producers, such as dry cleaners and automobile repair facilities, to larger producers such as hospitals and manufacturing operations. The EPA categorizes Small Quantity Generators (SQG) as those facilities that produce between 100 and 1,000 kilograms (kg) of hazardous waste per month. Facilities producing less than 100 kg of hazardous waste per month are not subject to RCRA. Large Quantity Generators (LQG) produce 1,000 kg or more hazardous waste per month. LQG and SQG facilities are subject to the storage and transportation requirements of RCRA.

The Federal Emergency Planning and Community Right-To-Know Act (EPCRA)

EPCRA was enacted in 1986 to inform communities and residents of chemical hazards in their area, this Act requires the EPA maintain and publish a list of toxic chemical releases, known as the Toxic Release Inventory (TRI). Facilities required to report include industrial uses that manufacture, process, or use significant amounts of chemicals. Reporting includes types and amounts of chemicals that are released each year into the air, water, and land or transferred off- site. Listing a facility on the TRI doesn't necessarily mean that releases are harmful to humans or the environment.

Federal Occupational Safety and Health Administration (OSHA)

OSHA establishes and enforces Federal regulations related to health and safety of workers exposed to toxic and hazardous materials. OSHA also sets health and safety guidelines for construction activities and manufacturing facility operations.

U.S. Department of Transportation (DOT)

The DOT governs transportation of chemicals and hazardous materials under Title 49 of the Code of Federal Regulations (CFR). The DOT stipulates the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. Under the Hazardous Materials Transportation Act (1975) and the Hazardous Materials Transportation Uniform Safety Act (1990), State agencies that have primary responsibility for enforcing federal and State regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol (CHP) and the California Department of Transportation (Caltrans).

Federal Aviation Administration (FAA)

The FAA provides regulations controlling land use in airport vicinities, as stipulated in Federal Aviation Regulations (FAR) Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace. These regulations require that any proposed new construction or expansion of existing structures that would penetrate any of the FAR Part 77 based "imaginary" horizontal and sloping navigational surfaces for airports would be deemed incompatible unless specifically determined otherwise by the FAA. Projects that plan construction or alterations which may affect navigable airspace are required to file notice with the FAA.

National Response Framework

The 2019 National Response Framework (Framework), published by the Department of Homeland Security, is a national response guide to all types of disasters and emergencies. The Framework describes specific authorities and best practices for managing incidents that range from serious local to large-scale terrorist attacks or catastrophic natural disasters. In addition, the Framework describes the principles, roles, responsibilities, and coordinating structures for responding to an incident and further describes how response efforts integrate with those of the other mission areas.

STATE

California Occupational Safety and Health Administration (Cal/OSHA)

Cal/OSHA is responsible for promulgating and enforcing state health and safety standards and implementing federal OSHA Laws. Cal/OSHAs regulatory scope includes provisions to minimize the potential for release of asbestos and lead during construction and demolition activities.

California Environmental Protection Agency (Cal/EPA)

The Cal/EPA implements and enforces a statewide hazardous materials program known as the Certified Unified Program Agency (CUPA), established by Senate Bill (SB) 1802, to enable counties and local government to enforce the administrative requirements, permits, inspections, and enforcement activities for the following environmental and emergency management programs for hazardous materials:

- Hazardous Materials Release Response Plans and Inventories (Business Plans)
- California Accidental Release Prevention Program
- Underground Storage Tank Program
- Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control, and Countermeasure Plans
- Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs
- California Uniform Fire Code, Hazardous Materials Management Plans, and Hazardous Material Inventory Statements

Cal/EPA-California Office of Emergency Services (Cal/EPA-Cal/OES)

Cal/EPA establishes regulations governing the use of hazardous materials in the state to protect air, water, and soil. Cal/OES coordinates state and local agencies and resources for educating, planning, and warning citizens of hazardous materials and related emergencies, including organized response efforts in case of emergencies.

CALFIRE, Office of the State Fire Marshal (CAL FIRE-OSFM)

CAL FIRE-OSFM evaluates and provides technical assistance for the Hazardous Material Management Plan (HMMP), the Hazardous Materials Inventory Statement (HMIS) and the Aboveground Petroleum Storage Act (APSA) Programs. The HMMP and HMIS Program are closely tied to the Business Plan Program.

California Fire Code (CFC)

The California Fire Code (CFC) establishes standards related to the design, construction, and maintenance of buildings. The standards set forth in the CFC range from designing for access by firefighters and equipment and minimum requirements for automatic sprinklers and fire hydrants to the appropriate storage and use of combustible materials.

California Hazardous Waste Control Law

The California Hazardous Waste Control Law is administered by the Cal/EPA to regulate hazardous wastes. Although the Hazardous Waste Control Law is generally more stringent than RCRA, until the EPA approves the California Hazardous Waste Control Program (which is charged with regulating the generation, treatment, storage, and disposal of hazardous waste), both the state and federal laws apply in California. The Hazardous Waste Control Law lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills. The California Code of Regulations (CCR) 22 CCR Section 66261.10 provides that waste has “hazardous” characteristics if it has the following effects:

> [a](1) a waste that exhibits the characteristics may: (A) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or

(B) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed or otherwise managed.

According to 22 CCR (Article 11, Chapter 3), substances having a characteristic of toxicity, ignitability, corrosivity, or reactivity are considered hazardous waste. Hazardous wastes are hazardous substances that no longer have a practical use, such as material that has been abandoned, discarded, spilled, contaminated, or are being stored prior to proper disposal. Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability or death. For example, toxic substances can cause eye or skin irritation, disorientation, headache, nausea, allergic reactions, acute poisoning, chronic illness, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substance involved). Carcinogens (substances known to cause cancer) are a special class of toxic substances. Examples of toxic substances include most heavy metals, pesticides, and benzene (a carcinogenic component of gasoline). Ignitable substances (e.g., gasoline, hexane, and natural gas) are hazardous because of their flammable properties. Corrosive substances (e.g., strong acids and bases such as sulfuric [battery] acid or lye) are chemically active and can damage other materials or cause severe burns upon contact. Reactive substances (e.g., explosives, pressurized canisters, and pure sodium metal, which reacts violently with water) may cause explosions or generate gases or fumes.

Other types of hazardous materials include radioactive and biohazardous materials. Radioactive materials and wastes contain radioisotopes, which are atoms with unstable nuclei that emit ionizing radiation to increase their stability. Radioactive waste mixed with chemical hazardous waste is referred to as “mixed wastes.” Biohazardous materials and wastes include anything derived from living organisms. They may be contaminated with disease-causing agents, such as bacteria or viruses (22 CCR 66251.1 et seq.).

California Department of Toxic Substances Control (DTSC)

The DTSC, which is a department of Cal/EPA, is authorized to carry out the federal RCRA hazardous waste program in California to protect people from exposure to hazardous wastes. The department regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California, primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California H&SC Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, CCR, Divisions 4 and 4.5). Permitting, inspection, compliance, and corrective action programs ensure that people who manage hazardous waste follow federal and state requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. EnviroStor is DTSC’s data management system for tracking cleanup, permitting, enforcement and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further.

Underground Tank Regulations

Title 23, Division 3, Chapter 16 (Underground Tank Regulations) of the CCR identifies the regulations applicable to new and existing underground storage tanks. These regulations establish monitoring, maintenance, reporting, abatement, and closure procedures for all underground storage tanks in the state. These regulations are administered by the North Coast Regional Water Quality Control Board.

California Highway Patrol (CHP)

The CHP has primary regulatory responsibility for the transportation of hazardous wastes and materials in California.

Cortese List

California Government Code Section 65962.5 established the (Cortese) List, which requires state agencies to compile a list of all properties affected by hazardous waste and develop a framework for how they will continue to be monitored and addressed by the state. A site's presence on the list has bearing on the local permitting process as well as on compliance with the California Environmental Quality Act (CEQA). The DTSC is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List. There are no hazardous materials release sites located in the Planning Area listed on the Cortese List (DTSC 2023).

California Porter Cologne Water Quality Control Act

The SWRCB and nine Regional Water Quality Control Boards (RWQCBs) have authority to implement and enforce water rights and water quality policy under the Porter-Cologne Water Quality Control Act (Porter-Cologne Act). The Porter-Cologne Act applies to both surface water and groundwater and regulates both point and nonpoint sources of pollution. Standard remedies include issuance of Cease-and-Desist Orders and cleanup and abatement procedures.

Code of Regulations Title 22

Title 22 of the CCR contains all applicable state and federal laws governing hazardous wastes in the state. Title 22 is more stringent and broader in its coverage of wastes than federal law. Chapter 51 (Site Remediation) identifies the minimum standards of performance for site investigations and response actions performed by the private sector in site cleanup efforts.

Hazardous waste is waste with properties that make it potentially dangerous or harmful to human health or the environment. Hazardous waste is defined in one of two ways. Waste is considered hazardous if it appears on one of the five lists created pursuant to the RCRA. The lists are known as the F-, K-, P-/U-, and M lists and reflect non-specific source waste, source-specific waste, discarded commercial chemical products, discarded mercury-containing products, respectively. A waste may also be categorized as hazardous if it exhibits one of the four characteristics of hazardous materials: ignitibility, corrosivity, reactivity, and toxicity.

Because of its toxicity, solid wastes containing certain levels of lead are considered hazardous and must be handled, transported, and disposed of in accordance with federal and state law. In California, two thresholds have been established by state regulation to determine if a waste is hazardous due to its lead content. The Total Threshold Limit Concentration (TTLC) establishes a threshold of 1,000 milligrams (mg) of lead per one kg of waste. The Soluble Threshold Limit Concentration (STLC) establishes a threshold of 5 mg of lead per liter (L) of waste extract solution. Hazardous waste must be disposed of at Class I landfills that are specifically designed to accept hazardous waste, such as the Kettleman Hills Landfill in Kettleman City in Kings County.

California Asbestos Standards in Construction

The Cal/OSHA enforces the California Asbestos Standards in Construction (8 CCR Section 1529). These standards regulate exposure to asbestos in all construction work including demolition of structures. These regulations establish entry and exit procedures after working in asbestos contaminated areas and

establish specific control measures designed to protect workers depending on the type of asbestos they are handling. Such procedures include minimum air circulations, use of respirators, wetting of materials, clothing laundering, construction and demolition equipment requirements, and shielding specifications. Notification procedures are also in place that require building owner and employee noticing as well as external and internal hazard signage. All asbestos workers are required to complete training programs and register as an asbestos contractor, depending on the type of asbestos being removed. Medical examination requirements are also required to monitor worker health, generally on an annual basis.

California Construction Safety Orders for Lead

Title 8, Section 1532.2 (Lead) of the CCR establishes the requirements for any construction worker who may be exposed to lead during demolition or salvage, removal or encapsulation, new construction, and cleanup activities. The construction safety orders establish an action level of 30 micrograms of lead per cubic meter (µg/cm3) of air calculated over an 8-hour time-weighted average without regard for the use of a respirator, meaning this is the limit where safety protocols must be initiated, such as use of a respirator. Under no circumstance may a worker be exposed to 50 µg/cm3 over an 8-hour weighted period. These regulations require implementation of engineering and work practice controls such as respiratory protection, protective clothing, housekeeping, hygiene practices, and signage requirements to meet worker exposure limits. Medical monitoring and training requirements are also identified.

Assembly Bill 2948

In response to the growing statewide concern of hazardous waste management, State Assembly Bill 2948 (Tanner 1986) enacted legislation authorizing local governments to develop comprehensive hazardous waste management plans. The intent of each plan is to ensure that adequate treatment and disposal capacity is available to manage the hazardous wastes generated within its jurisdiction.

Hazardous Materials Business Plan (CERS Annual Submittal)

In 1986, the Cal/OES established the Hazardous Materials Business Plan (HMBP) Program, which prevents or minimizes damage to the public and the environment from a release of hazardous materials. Under the Program, California businesses that handle hazardous materials were required to submit an HMBP each year. Assembly Bill 1429, which was passed on July 9, 2019, would require a business with a facility that is not required to submit Tier II information pursuant to the above-mentioned federal provision and is not subject to the provisions governing those aboveground storage tanks to submit its business plan once every three years, instead of annually.

Emergency Services Act

Under the Emergency Services Act of 1970, the State of California developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local agencies. Rapid response to incidents involving hazardous materials or hazardous waste is an integral part of the plan, which is administered by the Governor's Office of Emergency Services. The Office of Emergency Services coordinates the responses of other agencies, including the Cal/EPA, CHP, RWQCBs, Air Quality Management Districts, and county disaster response offices.

The Emergency Planning Community Right-to-Know Act (1986)

The Emergency Planning Community Right-to-Know Act (1986) requires facilities to disclose to the state and Local Emergency Planning Committee the quantities and type of toxic chemicals stored. To avoid multiple reports to various agencies, the California Health and Safety Code requires notification of

chemical inventories to the Administering Agency, which is DTSC. Notification of chemical inventory is accomplished through completion of a Hazardous Materials Business Plan and inventory.

Standardized Emergency Management System (SEMS) and National Incident Management System (NIMS)

According to the state's SEMS, local agencies have primary authority regarding rescue and treatment of casualties and making decisions regarding protective actions for the community. When a major incident occurs the first few moments are critical in terms of reducing loss of life and property. First responders must be sufficiently trained to understand the nature and the gravity of the event to minimize the confusion that inevitably follows catastrophic situations. This on-scene authority rests with the local emergency services organization and the incident commander.

Regional and Local

Certified Unified Program Agencies (CUPA)

Senate Bill 1082 (1993) required the establishment of a unified hazardous waste and hazardous materials management program. The result was the Cal/EPA United Program, which consolidates the actions of DTSC, the SWRCB, the RWQCB, OES, and the State Fire Marshall. DTSC oversees the implementation of the hazardous waste generator and onsite treatment program, one of six environmental programs at the local level, through Certified Unified Program Agencies (CUPAs). CUPAs have authority to enforce regulations, conduct inspections, administer penalties, and hold hearings. The Mendocino County Department of Environmental Health (DEH) is the Administering Agency of the CUPA for Mendocino County.

Mendocino County Department of Environmental Health

The Mendocino County DEH is the CUPA for the City of Willits and consolidates, coordinates, and makes consistent the following existing programs:

- Solid Waste Program;
- Hazardous Materials Management Plan;
- Onsite Wastewater Treatment Systems and Water Wells.

Multi-Juristiction Hazard Mitigation Plan for Mendocino County (2021)

The Mendocino County Multi-Juristiction Hazard Mitigation Plan (MJHMP 2021) was developed to assess risks posed by natural and human-caused hazards and to develop a mitigation strategy for reducing the County's risks. The County prepared the 2021 MJHMP in accordance with the requirements of the Disaster Mitigation Act of 2000 (DMA 2000). The preparation of the MJHMP was performed in cooperation with the cities Fort Bragg, Point Arena, Ukiah, and Willits, along with the Mendocino County Office of Education. The MJHMP was also developed to ensure the County and the cities eligibility for federal disaster assistance, including Federal Emergency Management Agency's (FEMA) Pre-Disaster Mitigation (PDM), Hazard Mitigation Grant Programs (HMGP), and Flood Mitigation Assistance Program (FMA). The City of Willits adopted its jurisdictional annex chapter of the MJHMP on December 9, 2020. Hazards identified for the City of Willits include earthquakes, wildfire, dam failure, flood drought, extreme weather, pandemic and climate change. Table 4-11, City of Willits Mitigation Actions, lists each hazard and mitigation action for City of Willits.

Mendocino County Office of Emergency Services

The Mendocino County Office of Emergency Services (OES) is the primary local coordination agency for emergencies and disasters affecting residents, public infrastructure, and government operations in the Mendocino County Operational Area. The Mendocino Operational Area includes the entirety of the County and its cities, towns, and special districts, in coordination with independent tribes. OES is charged with providing the necessary planning, coordination, response support and communications with all agencies affected by large scale emergencies or disasters. OES works in a cooperative effort with other governmental jurisdictions within the county; disciplines such as law enforcement, fire, and emergency medical services, state and federal agencies, utilities, private industry and volunteer groups in order to provide a coordinated response to disasters.

Mendocino County Operational Area Emergency Operation Plan (2016)

The Mendocino County/Operational Area EOP (2016) serves as the primary guide for coordinating and responding to all emergencies and disasters within the county. It is required to comply with local ordinances, state law, and state and federal emergency planning guidance including the SEMS, NIMS, and the Incident Command System (ICS). The Mendocino County/Operational Area EOP addresses response to and short-term recovery from disasters and emergency situations affecting the Mendocino County Operational Area.

In disaster situations, emergency management and homeland security operations start at the local level and expand to include regional, state, federal and private/non-profit sector assets as the affected jurisdictions requires additional resources and capabilities. The purpose of this plan is to facilitate multi-agency and multi-jurisdictional coordination during emergency operations, particularly between Mendocino County, local and tribal governments, special districts as well as state and federal agencies.

The development of the Mendocino County EOP was funded by the Emergency Management Performance Grant program. This plan is based on the authority of the local government(s) for emergency response and contains specific emergency support functions to be provided during an emergency, disaster. This EOP applies to all jurisdictions and agencies that operate within Mendocino County and delegates the Mendocino County Sheriff's Office – Office of Emergency Services the authority and responsibility for the coordination and administration of emergency operations for the Operational Area of Mendocino County. Agencies and jurisdictions within the Operational Area have the responsibility to develop and maintain plans, policies, and procedures pertaining to emergency and disaster response operations of their agencies and/or jurisdictions.

Vision 2020 Willits General Plan Revision (1992)

The General Plan (1992), includes the a series of safety policies (Section 7.200) to be applied to development within the City as it concerns the health and safety of structures and individuals. At this time that this EIR was drafted the 2019 Draft Safety Element Updated, which was prepared to address changes in state law since the Safety Element was adopted in 1992, including hazardous materials and waste, aircraft hazards, and wildfire hazards as they relate to Willits, but has had not yet been adopted. The following are applicable policies from the current General Plan Safety Element.

- 7.200 Safety Policies:
  - 7.210 Cooperate with the Little Lake Fire District in developing standards and guidelines to assure adequate fire protection and the provision of medical and other emergency services for all persons and property in the community.
  - 7.220 Encourage installation of fire safety devices in all residences and require such installation at the time of original construction, remodeling or expansion.

- 7.230 Establish five minutes or two miles travel distance as the minimum response time or travel distance from the nearest fire station. Outside of this response range, built-in fire protection systems (i.e., sprinklers) shall be required in all new buildings.

- 7.240 Upon completion of the U.S. 101 bypass, prohibit the transport of hazardous materials along Main Street north of State Route 20.7.300 Safety Implementation Measures
  - 7.320 Maintain regular fire and seismic safety inspection programs with priority given to emergency facilities, public buildings and older structures.
  - 7.350 Consider fire, flooding, geologic and seismic safety risks in reviewing proposals for development.

City of Willits Municipal Code

The City of Willits Municipal Code contains various regulations pertaining to hazards and hazardous materials. Title 8 addresses health and safety, with relevant Chapters focused on Solid Waste and Recycling, Construction and Demolition Recycling, and Nuisances. Title 15 provides requirements for compliance with the Uniform Fire Code Standards. Title 17 provides zoning regulations that include relevant standards such as a Natural Hazard Combining Zone and Performance Standards that prohibit, amongst other standards, dangerous or objectionable elements.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS

Consistent with Appendix G of the State CEQA Guidelines, the Project would have if a significant impact if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
5. For development within the Project area located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area;
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

The potential impacts associated with items 1 and 2 listed above will be discussed jointly below under “Impact HAZ-01 and 02” given the heavy overlap in scope of analysis required to determine the level of potential impact.

METHODOLOGY

The proposed Project was qualitatively analyzed to address consistency with relevant federal, state, and local plans and regulations pertaining to hazards and hazardous materials.

PROJECT IMPACTS AND MITIGATION

Impact HAZ-01 and 02: Development facilitated by the Project has the potential to create a significant hazard to the public or the environments through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Future development facilitated by the Project may involve the transportation, use, and/or disposal of hazardous materials from time to time, and may involve equipment or construction activities that use hazardous materials (e.g., coatings, solvents and fuels, and diesel- fueled equipment), cleanup of sites with known hazardous materials, the transportation of excavated soil and/or groundwater containing contaminants from areas that are identified as being contaminated, or disposal of contaminated materials at an approved disposal site. Accidental release of hazardous materials used in the construction or operation of a future development project may occur. There is also the potential for accidental release of pre-existing hazardous materials, associated with previous activities on a site.

The use, transportation, and disposal of hazardous materials is regulated and monitored by local fire departments, CUPAs, the Cal/OSHA and the DTSC consistent with the requirements of federal, state, and local regulations and policies. Facilities that store hazardous materials on-site are required to maintain a HMBP in accordance with state regulations. In the event of an accidental release of hazardous materials, the local CUPA and emergency management agencies (e.g., Police and Fire) would respond. All future projects facilitated by the Project would be required to comply with the provisions of federal, state, and local requirements related to hazardous materials. As future discretionary development and infrastructure projects are considered by the City, each project would be evaluated for potential impacts, specific to the project, associated with hazardous materials as required under CEQA.

As described in the regulatory setting, hazardous materials regulations related to the use, handling, and transport of hazardous materials are codified in Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the California Health and Safety Code. These laws were established at the state level to ensure compliance with federal regulations to reduce the risk to human health and the environment from the routine use of hazardous substances. These regulations must be implemented by employers/businesses, as appropriate, and are monitored by the state (e.g., Cal/OSHA in the workplace or DTSC for hazardous waste) and/or the County. Implementation of CFR Title 49, Parts 171-180 would reduce impacts associated with the potential for accidental release of hazardous materials.

In addition to the requirements associated with federal and state regulations and the Municipal Code, the Draft Safety Element (2019) includes the following policies and actions to reduce potential impacts associated with hazardous materials, among other issues. Once adopted, these policies and actions would ensure that potential hazards are identified on a project site, that development is located in areas where potential exposure to hazards and hazardous materials can be mitigated to an acceptable level, and that business operations comply with federal and state regulations regarding the use, transport, storage, and disposal of hazardous materials.

- S-6.1 Monitor facilities known to use, store, transport, process, or dispose of hazardous materials or wastes.

- S-6.2 Prohibit the construction and development of new facilities known to use, store, transport, process, or dispose of hazardous materials or wastes near residential areas and public-serving facilities, unless effectively mitigated.
- S-6.3 Coordinate hazardous materials and wastes management and disposal programs with relevant local, regional, state, and federal agencies.
- S-6.4 Promote public awareness of common household hazardous materials and wastes.
- S-6.5 Require due diligence studies for new development in sensitive areas or areas of heavy industrial use, to better understand and define potential contamination issues within these areas.
- S-6.6 Prohibit the transport of hazardous materials along Main Street north of State Route 20.

As development facilitated by the proposed Project would be required to comply with the federal and state regulations in addition to the policies defined in the Draft Safety Element (2019), the proposed Project would not create a significant hazard to the public or the environments through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the updated hazardous materials policies of the Draft Safety Element would apply within the City. Through the implementation of this mitigation measure, potential impacts from hazardous materials would be less than significant. A less than significant impact would occur with mitigation incorporated.

MITIGATION MEASURE

GEO-1: Adopt Draft Safety Element

Refer to Mitigation Measure GEO-1.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant with mitigation.

Impact HAZ-03: Development facilitated by the Project has the potential to emit hazardous emissions or handle hazardous to acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The Project proposes land use changes and an expanded SOI area but does not propose specific development projects, or businesses. As such, it is not possible to determine if a future specific use enabled by the Project will result in hazardous emissions or require handling of hazardous or acutely hazardous materials, substances, or waste. The uses and business operations with the highest possibility of resulting in hazardous emissions or require handling of hazardous or acutely hazardous materials, substances, or waste would be manufacturing, and industrial and commercial businesses and uses. Some of these uses could occur within ¼ mile of an existing school facility. Each of these uses may use a variety of hazardous materials commonly found in urban areas including: paints, cleaners, and cleaning solvents. If handled appropriately, these materials do not pose a significant risk. The Industrial-General (M-G) land use designation generally provides for a variety of light and heavy industrial activities, such as manufacturing, processing, packaging, warehousing and distribution. These types of activities may result in nuisance impacts to nearby sensitive receptors. The Commercial-General (C-G) land use designation generally provides for a variety of commercial uses.

Most schools within the City of Willits are part of the Willits Unified School District (WUSD). The WUSD provides school services for grades kindergarten through twelfth (K-12). See table 3.9f below for a breakdown of schools, grades served, location within Willits, and level of enrollment.

Table 3.9f: Public Elementary, Middle, and High Schools Serving Willits

School Name	Grades Served	Address	2022-23 Enrollment
Brookside Elementary	K-2	20 Spruce St	363
Willits Elementary Charter	K-5	405 E Commercial St	145
Sherwood	K-8	32600 Sherwood Rd	68
Blosser Lane Elementary	3-6	1275 Blosser Ln	351
La Vida Charter	K-12	11785 Orchard Ln	79
Baecthel Gove Middle	6-8	1150 Magnolia St	270
Willits Charter	6-12	1431 S Main St	113
Willits High	9-12	299 N Main St	415
Sanhedrin Alternative	9-12	120 N Main St	67

Source: California Department of Education 2023

The Project is not anticipated to directly lead to the establishment of new businesses that could use or emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste because the Project does not propose specific development projects. However, given the unknown nature of future businesses that may be established within the areas proposed to be designation as C-G and M-G, the potential for hazardous materials is present.

All hazardous materials would be required to be handled in accordance with federal, state, and local requirements, which would limit the potential for a project to expose nearby uses, including schools, to hazardous emissions or an accidental release. Hazardous emissions are monitored by RWQCB, DTSC and the local CUPA. In the event of a hazardous materials spill or release, notification and cleanup operations would be performed in compliance with applicable federal, state, and local regulations and policies, including hazard mitigation plans.

Additionally, future development facilitated by the Project would be required to adhere to the following policies from the Draft Safety Element (2019), once adopted, to ensure hazardous emissions or the handling of hazardous to acutely hazardous materials, substances, or wastes do not occur within one-quarter mile of an existing or proposed school:

- S-6.1 Monitor facilities known to use, store, transport, process, or dispose of hazardous materials or wastes.
- S-6.2 Prohibit the construction and development of new facilities known to use, store, transport, process, or dispose of hazardous materials or wastes near residential areas and public-serving facilities, unless effectively mitigated.
- S-6.3 Coordinate hazardous materials and wastes management and disposal programs with relevant local, regional, state, and federal agencies.
- S-6.4 Promote public awareness of common household hazardous materials and wastes.
- S-6.5 Require due diligence studies for new development in sensitive areas or areas of heavy industrial use, to better understand and define potential contamination issues within these areas.
- S-6.6 Prohibit the transport of hazardous materials along Main Street north of State Route 20.

Compliance with existing regulations as well as the Draft Safety Element (2019) policies S-6.1 through S-6.6 related to land use compatibility and hazardous materials would reduce significant impacts. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the updated hazardous materials policies of the Draft Safety Element would apply to development within the City. Through the implementation of this mitigation measure, potential impacts related to land use compatibility and hazardous materials would be less than significant. A less than significant impact would occur with mitigation incorporated.

MITIGATION MEASURE

GEO-1: Adopt Draft Safety Element

Refer to Mitigation Measure GEO-1.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant with mitigation.

Impact HAZ-04: Development facilitated by the Project has the potential to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

As provided in Table 4.9-1, there are ten (10) locations with a Willits address that are listed in the EnviroStor database (DTSC, 2019), including one (1) listed as Inactive – Needs Evaluation and the remaining nine (9) are referred to the RWQCB. The Geotracker database (SWRCB, 2023), lists 55 LUSTs at sites with a Willits address. Of these, 54 are listed as Case Closed, meaning 54 have undergone LUST cleanup and the SWRCB has closed the case. The is one (1) LUST site open for site assessment. Refer to Table 4.9-2, above, for the location of the open and closed cases for LUSTs in Willits. One (1) active solid waste facility is located in the City (CalRecycle 2019). The Willits Solid Waste Transfer and Recycling Center, located at 350 Franklin Avenue, is active and permitted. In total there are 10 active and 1 inactive (requiring evaluation to close) hazardous materials release sites located in the Planning Area listed on the Cortese List (DTSC 2023).

The above-mentioned sites are subject to various federal and state laws and regulatory agencies, including the CERCLA, EPA, DTSC, and RWQCB. The Project does not propose specific development projects; however, development facilitated by the Project could create a hazard to the public or the environment through a disturbance or release of contaminated materials if the development occurs on or adjacent to contaminated sites without appropriate measures to contain or mitigate the existing contamination. Federal and state regulations ensure that existing hazards, including those associated with known hazardous materials sites, are addressed prior to development. Compliance with federal and state regulations would ensure that potential impacts associated with the hazardous conditions on sites listed pursuant to Government Code Section 65962.5 Cortese List would be less than significant.

MITIGATION MEASURE

No mitigation measures would be required.

Impact HAZ-05: Development facilitated by the Project would not be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport,

and would not result in a safety hazard or excessive noise for people residing or working in the project area.

As previously discussed, Ells Field (028) – Willits Municipal Airport is owned and operated by the City. A portion of the Planning Area is located within the airport influence area and approach and overflight safety zones; however, the Land Use Change Areas and SOI areas are located outside airport zones. The Draft Safety Element (2019) includes the following policies intended to ensure future developments are consistent with the Mendocino County Airport Comprehensive Land Use Plan (1996):

- S-7.1 Incorporate aircraft emergency response procedures into the Willits Emergency Operations Plan.
- S-7.2 Integrate aircraft programming into emergency planning and response preparations and trainings within the City/ Operational Area.
- S-7.3 Maintain communication with appropriate authorities as airport services grow and expand.
- S-7.4 Identify key vulnerabilities for the airport focused on wildfire hazards, roadway connectivity, and other critical hazards that could impact operations and use.
- S-7.5 Identify and remove potential safety hazards within the flight path of the airport to ensure safe takeoff and landings.

Implementation of the Draft Safety Element policies and actions discussed above, as well as federal and state regulations, would lessen potential impacts from future development facilitate by this Project. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the airport related hazardous policies of the Draft Safety Element would apply to development within the City. Through the implementation of this mitigation measure, potential impacts from related to would be less than significant. A less than significant impact would occur with mitigation incorporated.

MITIGATION MEASURE

GEO-1: Adopt Draft Safety Element

Refer to Mitigation Measure GEO-1.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant with mitigation.

Impact HAZ-06: Development facilitated by the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The Project may facilitate new development, including residential, commercial, industrial, and public projects, which would result in increased jobs and population in Willits. Road and infrastructure improvements would most likely occur to accommodate the new growth. Future development and infrastructure projects are not anticipated to remove or impede established evacuation routes within the City. Furthermore, the Project does not include land uses, policies, or other components that conflict with adopted emergency response or evacuation plans. However, given that the type, location, and size of future development and infrastructure projects is not known at this time, there is the potential that the City could receive a development proposal that could potentially interfere with an established emergency

evacuation route or plan. According to the Mendocino County/Operational Area EOP (2016), Willits is a partner of the Mendocino County Operation Area.

The proposed Land Use Element Updated includes policy LU-9.7, Emergency Evacuation, which prohibits subdivisions in neighborhoods having only one access or that are vulnerable to isolation if access roads are impacted, until alternative evacuation routes are established or where the Fire Marshal has determined that access and egress are adequate. This policy is intended to limit the likelihood that development enabled by the Land Use Element will impair an emergency evacuation plan.

Additionally, the Draft Safety Element (2019) contains the following policies that once adopted would ensure that the City's emergency access routes, emergency contact lists, and public information regarding designated facilities and routes are regularly reviewed to ensure that up to date information is available to the City and the public in the event of an emergency:

- S-3.5 Require all new development to comply with fire safety standards identified in Chapter 15.16 of the Willits Municipal Code.
- S-3.6 Identify key metrics and recommendations from the Little Lake Fire Protection District to ensure adequate service is provided to residents and businesses.
- S-3.7 Locate new critical facilities outside of the Very High Fire Hazard Severity Zones, unless no alternate location is available or feasible.
- S-3.9 Consider the relationship between existing and future development on the current and future demands for Fire and Emergency Services facilities and personnel.

As development facilitated by the Project would be required to comply with the Mendocino County/Operational Area EOP and Draft Safety Element (2019) policies, the proposed Project would not be expected to result in the impairment of implementing or physically interfere with an adopted emergency response plan or emergency evacuation plan. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the emergency operations and evacuation related policies an programs of the Draft Safety Element would apply to development within the City. Through the implementation of this mitigation measure, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. A less than significant impact would occur with mitigation incorporated.

Mitigation Measure

GEO-1: Adopt Draft Safety Element

Refer to Mitigation Measure GEO-1.

Significance After Mitigation

Impacts would be less than significant with mitigation.

Impact HAZ-07: Development facilitated by the Project has the potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

This section addresses whether the Project would expose people or structures to wildfire hazards. Wildfire, as it relates to emergency response planning, evacuation and wildfire risk is comprehensively addressed in Section 4.19, Wildfire.

Wildfires are a potential hazard to development and land uses located in the foothill and forested areas of the city. The severity of wildfire problems depends on a combination of vegetation, climate, slope, and people. Weather is one of the most significant factors in determining the severity of wildfires; natural fire patterns are driven by conditions such as drought, temperature, precipitation, and wind, and also by changes to vegetation structure and fuel (i.e., biomass) availability. In addition to natural factors such as lightning, human activity is a primary factor contributing to the incidence of wildfires. Campfires, smoking, debris burning, arson, public utility infrastructure, and equipment use are common human-related causes of wildfires.

As previously discussed under Fire Hazards, the City and most of the Little Lake Valley is designated as a LRA. The state has defined recommended FHSZs for LRA in Mendocino County and about 60 percent of the City of Willits boundary is High FHSZ and airport and the surface water treatment plant both contain some areas with Very High FHSZ.

The Draft Safety Element (2019) includes the policies related to ensuring adequate water supply and water flow availability, emergency access, and fire protection services, fire safe design and site standards, and public awareness regarding fire safety:

- S-3.1 Maintain up-to-date records and information on conditions in undeveloped and natural areas, especially areas considered part of the high and very high fire hazard severity zones.
- S-3.2 Promote comprehensive structural modification and fuel modification guidelines for new and existing (non-conforming) buildings and structures located within the high and very high fire hazard severity zones, in compliance with local and State [WUI] code requirements of the California Building Code, and any future updates.
- S-3.3 Restrict new development in high and very high fire hazard severity zones, unless designed using the most up to date wildfire mitigation techniques and code requirements, in compliance with local and State Wildland-Urban Interface code requirements.
- S-3.4 Coordinate wildfire response plans (i.e. CAL FIRE Unit Fire Plan) with Local, State, Federal, and Tribal entities, as appropriate.
- S-3.5 Require all new development to comply with fire safety standards identified in Chapter 15.16 of the Willits Municipal Code.
- S-3.6 Identify key metrics and recommendations from the Little Lake Fire Protection District to ensure adequate service is provided to residents and businesses.
- S-3.7 Locate new critical facilities outside of the very high fire hazard severity zone unless no alternate location is available or feasible.
- S-3.8 Require all new development and major redevelopment/reconstruction within the high and very high wildfire hazard severity zones to prepare a Fire Protection Plan.
- S-3.9 Consider the relationship between existing and future development on the current and future demands for Fire and Emergency Services facilities and personnel.

- S-3.10 Coordinate vegetation management activities with CAL FIRE, LLFPD, and users of the railway, including the Skunk Train and ensure fire risk is reduced within the railroad right of way.
- S-3.11 Identify and establish fire breaks in key locations (prioritizing the City's airport and water treatment plant) that preserve and protect critical infrastructure and reduce wildfire vulnerability for the City.

Development facilitated by the proposed Project would be required to comply with the provisions of federal, state, and local requirements related to wildland fire hazards, including state fire safety regulations associated with WUIs, fire-safe building standards, and defensible space requirements, and the Draft Safety Element (2019) policies, once adopted. However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the wildland fire mitigation policies of the Draft Safety Element would apply to development within the City. Through the implementation of this mitigation measure, the proposed Project would not expose people or structures to either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. A less than significant impact would occur with mitigation incorporated.

Mitigation Measure

GEO-1: Adopt Draft Safety Element

Refer to Mitigation Measure GEO-1.

Significance After Mitigation

Impacts would be less than significant with mitigation.

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Acronym List:

APSA	Aboveground Petroleum Storage Act
CCR	California Code of Regulations
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency
CFC	California Fire Code
CHP	California Highway Patrol
Cal/OSHA	California Occupational Safety and Health Administration
CAA	Clean Air Act
CWA	Clean Water Act
CFR	Code of Federal Regulations
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CUPA	Certified Unified Program Agencies
DTSC	Department of Toxic Substances
EOP	Emergency Operations Plan
FAA	Federal Aviation Administration
EPCRA	Federal Emergency Planning and Community Right-To-Know Act
FHSZ	Fire Hazard Severity Zone
HMBP	Hazardous Material Business Plan
HMIS	Hazardous Materials Inventory Statement
HMMP	Hazardous Material Management Plan
ICS	Incident Command System
kg	kilogram
LQG	Large Quantity Generators
LUST	Leaking Underground Storage Tank(s)
L	Liter
LRA	Local Responsibility Area
DEH	Mendocino County Department of Environmental Health
MJHMP	Mendocino County Multi-Juristiction Hazard Mitigation Plan

mg	milligram
NIMS	National Incident Management System
NPL	National Priority List
NTSB	National Transportation Safety Board
OSHA	Occupational Safety and Health Administration
OES	Office of Emergency Services
OSFM	Office of the State Fire Marshall
RWQCB	Regional Water Quality Control Board
RFI	Report of Facility Information
RCRA	Resources Conservation and Recovery Act
SQG	Small Quantity Generators
SWIS	Solid Waste Information System
STLC	Soluble Threshold Limit Concentration
SEMS	Standardized Emergency Management System
SRA	State Responsibility Area
SWRCB	State Water Resources Control Board
TTLC	Total Threshold Limit Concentration
UST	Underground Storage Tank(s)
VHFHSZ	Very High Fire Hazard Severity Zone
WUI	Wildland-Urban Interface
WUSD	Willits Unified School District
DOT	U.S. Department of Transportation
EPA	U.S. Environmental Protection Agency

3.10 HYDROLOGY AND WATER QUALITY

This section summarizes the existing hydrological resources and water quality within the Planning Area and the region, agencies and regulations related to hydrology and water quality, and analyzes potential impacts that may directly or indirectly result from the proposed Project.

ENVIRONMENTAL SETTING

Watershed and Surface Waters

The Planning Area is located in the Lower Davis Creek Watershed. The Lower Davis Creek Watershed contains numerous streams, a seasonal lake, and wetlands. The streams within the Lower Davis Creek Watershed flow north and converge into Outlet Creek. Streams in this area generally have high flows during the wet season and may have lower flows during the dry season due to groundwater recharge (LACO 2020). Streams within the Planning Area include Broaddus, Mill, Baetchel, and Haehl Creeks.

Groundwater

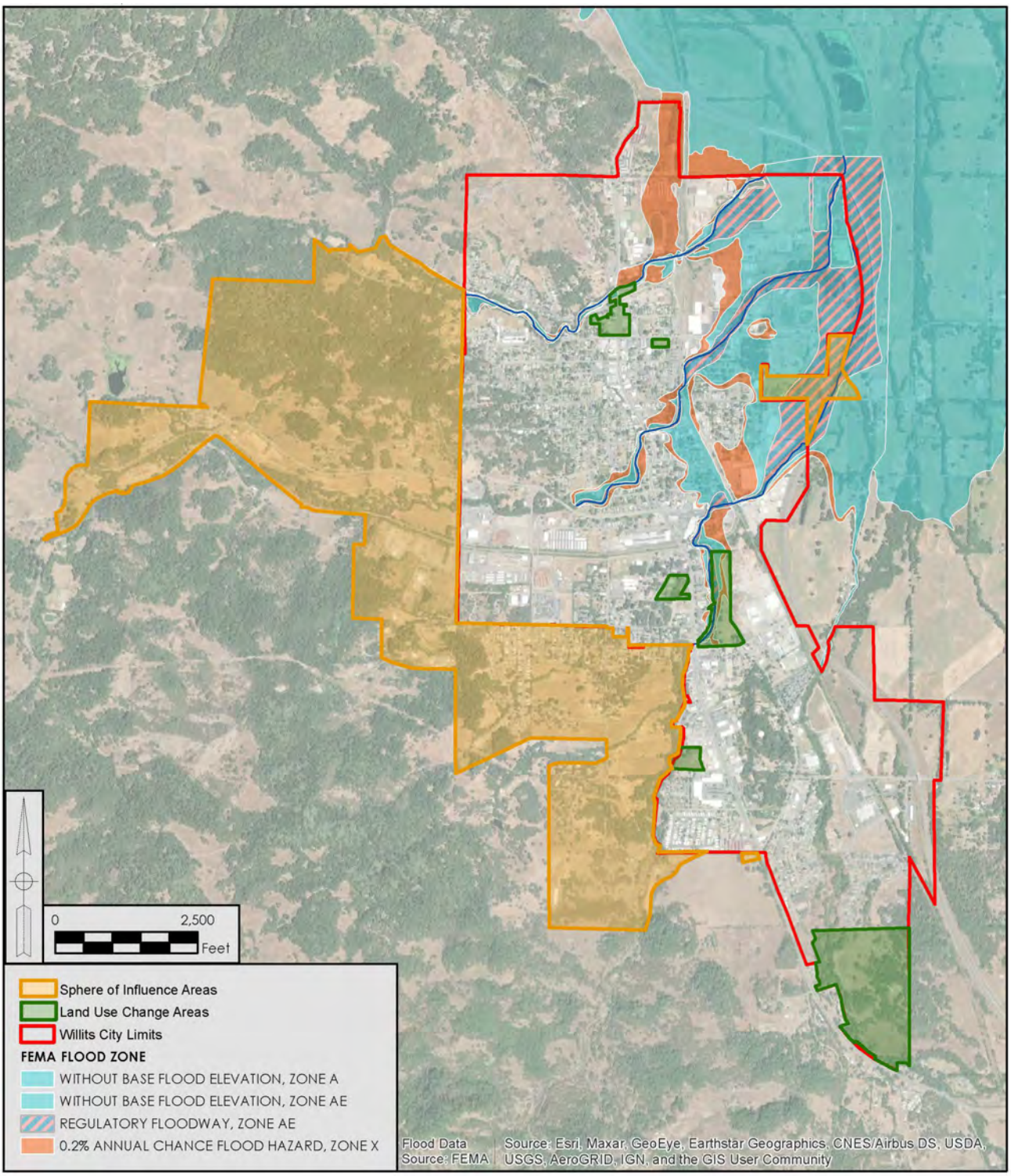
The Planning Area is located within the Little Lake Valley Groundwater Basin (Basin). According to the Little Lake Valley Groundwater Management Plan (2020), groundwater within the Basin is supplied by two (2) principal aquifers and fractures of the Franciscan Complex. One of the aquifers consists of Holocene alluvial deposits (Aquifer 1) and is the primary hydrogeologic unit for groundwater supply in the Basin. Holocene alluvial deposits generally have high yields, and wells in these areas produce an average yield of 20 gallons per minute (gpm), although wells can produce a maximum of 1,000 gpm in some areas. The other aquifer consists of Pliocene to Pleistocene continental basin deposits (Aquifer 2) and underlies the Holocene alluvium deposits. Continental basin deposits have been found to yield significantly less than Holocene alluvial deposits, with yields ranging from less than 1 gpm to 45 gpm. The Franciscan Complex is not a principal aquifer, but a number of springs have developed along joints and fractures of this formation. Wells in the Franciscan Complex have sporadic occurrence and marginal capacity, with yields ranging from no water to 200 gpm (LACO 2020).

The main source of recharge in the Basin is precipitation, although other sources of recharge include surface water infiltration, return flows from sewage and irrigation, and the potential up flow of groundwater along fault zones. Groundwater levels in the Basin fluctuate principally in response to pumping and precipitation, with seasonal variations. Long term groundwater levels have been observed to be relatively flat to slowly recovering from heavy well pumping and drought. Additionally, current groundwater levels are as high or higher than the earliest recorded data (LACO 2020).

Flooding and Dam Inundation

The Federal Emergency Management Agency (FEMA) Flood zones designated by FEMA for the Planning Area are shown on Figure 3.10a. As shown on Figure 3.10a, the City of Willits contains 100-year and 500-year flood zones. These flood zones are generally located in the northeastern portion of the Planning Area, although some flood zones are also present alongside surface water running through other portions of the Planning Area. The easternmost portion of the Sphere of Influence Areas contains both 100-year and 500-year flood zones. This area is partially developed with residential development, industrial development, and a County of Mendocino law enforcement facility and is surrounded by urban development to the north, west, and south, and is bordered by the U.S. 101 to the east. This area is proposed to have land use designations of Residential – Low Density, Residential – Medium Density, Industrial – General, and Public – Service. Additionally, two (2) of the Land Use Change Areas contain 100-year and 500-year flood zones. These Land Use Change Areas are partially developed, are

Figure 3.10a: Federal Emergency Management Agency Flood Zones



surrounded by urban development, currently have a land use designation of Commercial – General and Industrial – General, and are proposed to be designated as General Mixed Use.

Dam inundation is the area that would be inundated in the event of dam failure. Dam failure may post a potential risk to portions of the City of Willits due to its proximity to several dams and drainages that floodwaters would travel (City of Willits, 2019). Figure 3.10b shows the dam inundation areas for the dams located at Morris Reservoir, Centennial Reservoir, Lake Emily, and Lake Winawa. The Planning Area is outside of the dam inundation area for dams located at Morris Reservoir Centennial Reservoir, and Lake Winawa. The dam inundation area for the dam located at Lake Emily runs along the northern border of the northernmost Sphere of Influence Area, although this area is partially developed and has developmental constraints due to topography and a high number of property owners. Dam inundation mapping data was obtained from the County of Mendocino and data approved by the California Department of Resources (DWR).

Stormwater Runoff

The City of Willits does not operate with a municipal separate storm sewer system (MS4). Instead, the City's storm drain system consists of approximately 5.6 miles of storm drain lines as well as open channels and drainage ditches. These drainage facilities collect and convey the City's stormwater runoff to the discharge points in Broaddus, Mill, Baetchel, and Haehl Creeks. These discharge points and other drainages ultimately convey stormwater to Outlet Creek, which is a tributary to the Main Fork of the Eel River (LACO 2023).

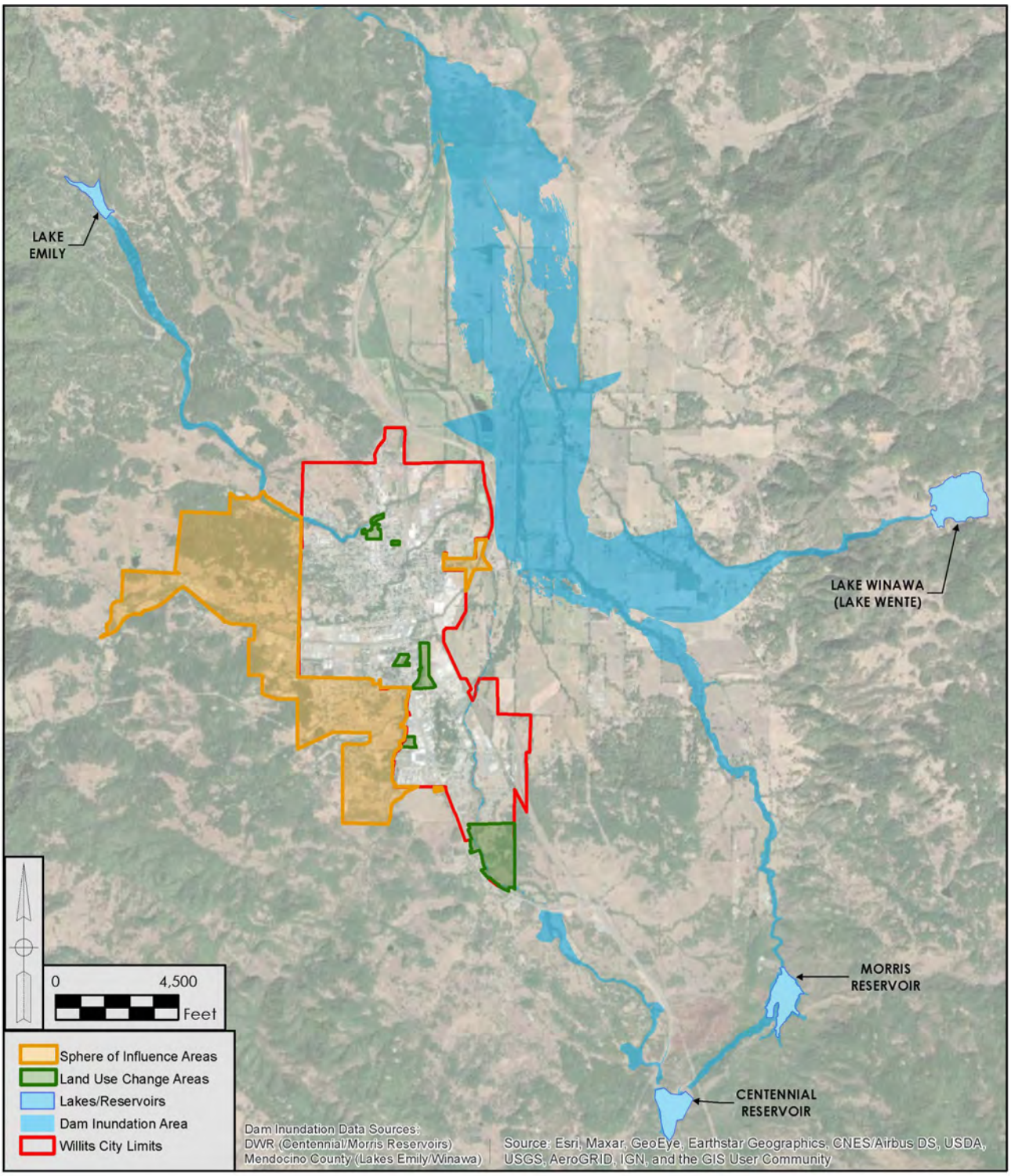
Peak flows increase on the north end of the Planning Area near the confluence of various creeks. Localized flooding occurs every two to three years along East Commercial Street and East Valley Street, and is also typical for the Walnut Street area, Highway 20, Manor Way, Alder Lane, and other areas adjacent to Broaddus, Baechtel, and Mill Creeks. Stormwater flows within the Planning Area tend to peak quickly during an intense rainfall event and recede quickly once the intensity decreases. Constraints of the City's storm drainage system include undersized drainage facilities, overgrown and blocked stream channels, and water surface elevation in receiving waters (LACO 2023).

Water Quality

In general, the groundwater quality in the Holocene alluvial deposits is characterized mainly as bicarbonate type. Groundwater in Aquifer 1 has been observed to be impaired by high concentrations of iron, manganese, chloride, boron, and arsenic. Reported concentrations of iron, manganese and chloride generally exceed United States Environmental Protection Agency (EPA) secondary standards for drinking water; however, these secondary standards are non-enforceable guidelines, as these contaminants have the potential to cause cosmetic or aesthetic effects rather than detrimental health effects. Additionally, although boron concentrations exceed those that are acceptable to agricultural use, the EPA has no standard for boron. One groundwater well in the Planning Area, referred to as the Long 20 Test well, showed increasing concentration of arsenic with increasing depth, while another well, referred to as the Elias Replacement well, showed no detectable arsenic concentration (LACO 2020). Both wells are owned and maintained by the City of Willits.

Similar to Aquifer 1, the groundwater quality of Aquifer 2 in the continental basin deposits is characterized as bicarbonate type. Aquifer 2 contains approximately equal proportions of calcium, magnesium and sodium when compared to groundwater sampled from Aquifer 1; however, groundwater extracted from Aquifer 2 has a higher proportion of sodium when compared to Aquifer 1 (LACO 2020).

Figure 3.10b: Dam Inundation Areas



Water from the Franciscan Complex has been observed to have high, but acceptable, mineral content. Groundwater wells in the Franciscan Complex have been reported to be impaired by high concentrations of chloride, boron, and temperatures approximately 6 to 8 degrees warmer than groundwater extracted from other wells at a similar depth (LACO 2020).

Potential sources of pollutants for surface water within the Basin include leaking underground storage tanks, chlorinated solvent releases, landfills, industrial spills, private and municipal wastewater systems, agriculture, and polluted stormwater runoff. Additionally, drought conditions can impact the quality of surface water. Surface water quality in the Upper Main Stem of the Eel River and its tributaries, including Tomki Creek, Outlet Creek, and Lake Pillsbury are listed as impaired for temperature and sediment by the State of California and the EPA, in accordance with Section 303(d) of the Clean Water Act (CWA) (EPA 2004).

REGULATORY SETTING

FEDERAL

Clean Water Act

The CWA, as amended by the Water Quality Action of 1987, is the major federal legislation governing water quality. Section 303(d) of the CWA requires states to periodically prepare a list of surface waters in the state for which beneficial uses of the water – such as drinking, recreation, aquatic habitat, and industrial use – are impaired by pollutants. These are estuaries, lakes, streams, and groundwater basins that fall short of state surface water quality standards and are not expected to improve within the next two (2) years. States are also required to develop Total Maximum Daily Loads (TMDLs) for the contaminant(s) of concern, specifying the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards, and allocating pollutant loadings among point and non-point pollutant sources.

Section 404 of the CWA establishes a program to regulate the discharge of dredged or fill material into waters of the U.S., including wetlands. Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 of the CWA requires a permit before dredged or fill material may be discharged into waters of the United States, unless the activity is exempt from regulation under Section 404 of the CWA (e.g., certain farming and forestry activities).

Federal Emergency Management Agency

FEMA administers the National Flood Insurance Program (NFIP), which provides flood insurance to property owners and encourages the development of floodplain management regulations. The purpose of the National Flood Insurance Act of 1968 (NFIA), which led to the creation of the NFIP, was to provide flood insurance, encourage floodplain management standards, and identify areas of flood hazards. Therefore, FEMA has defined flood zones that are depicted by FEMA Flood Insurance Rate Maps (FIRMs).

National Pollutant Discharge Elimination System Program

Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) permit program in 1972 to address water pollution by regulating point sources that discharge pollutants to waters of the United States. The EPA is charged with regulating and administering permits for such

discharges to surface waters. This includes discharges from municipal, industrial, and construction sources. Projects encompassing one (1) acre or more must be covered by the NPDES permit program.

STATE

Porter-Cologne Water Quality Control Act

The State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) have authority to implement and enforce water rights and water quality policy under the Porter-Cologne Water Quality Control Act (Porter-Cologne Act). The Porter-Cologne Act applies to both surface water and groundwater and regulates both point and nonpoint sources of pollution.

Sustainable Groundwater Management Act

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package collectively known as the Sustainable Groundwater Management Act (SGMA). SGMA requires local agencies to form groundwater sustainability agencies for high and medium priority basins. Groundwater sustainability agencies develop and implement groundwater sustainability plans to avoid undesirable results and mitigate overdraft within 20 years.

State Water Resources Control Board National Pollutant Discharge Elimination System Program

In California, NPDES permitting authority, as discussed above, is administered by the SWRCB. Construction projects that disturb more than one (1) acre of land, or projects that result in less than one (1) acre but are part of a larger common plan of development that totals one or more acre of land disturbance, are subject to the requirements of General Construction Activity Stormwater Permit (Construction General Permit Order 2022-0057-DWQ, also known as the CGP), which requires operators of such construction sites to implement stormwater controls and develop a Stormwater Pollution Prevention Plan (SWPPP) identifying specific Best Management Practices (BMPs) to be implemented to minimize the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. The CGP also requires post-construction BMPs to reduce runoff and pollutants in stormwater discharges (SWRCB 2022).

REGIONAL AND LOCAL

City of Willits Municipal Code

The City of Willits Municipal Code contains various regulations pertaining to hydrology and water resources. Title 13 addresses discharge requirements to meet local, state, and federal regulations. Title 14 addresses the City's water services, including infrastructure and water usage. Title 17 Sections 38 and 40 regulate development in flood zones.

Design and Construction Standards

In 2009, the City of Willits developed a 100% Draft Design and Construction Standards (Standards), which requires projects that disturb one (1) acre or more prepare and implement a SWPPP in accordance with the CGP. Additionally, the City of Willits Standards require that projects that involves submitting a Notice of Intent (NOI) to the SWRCB must submit a copy of the SWPPP as part of an Erosion Control Permit application to the City of Willits. Low Impact Design (LID) Guidelines for Stormwater Management are included as Appendix B of the City of Willits Standards, and discuss various LID stormwater management strategies, including bioretention, tree box filters, permeable pavers, soil amendments, and green roofs. These guidelines and standards were updated in 2011.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS

Consistent with Appendix G of the CEQA Guidelines, the proposed Project would have a significant impact on the environment associated with hydrology and water quality if it would:

- Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
- Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    - Result in substantial erosion or siltation on or offsite;
    - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;
    - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    - Impede or redirect flood flows;
- In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and/or
- Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

METHODOLOGY

The proposed Project was qualitatively analyzed to address consistency with relevant groundwater management or water quality plans. Additionally, this section describes the federal, state, and local regulations that development facilitated by the proposed Project would be required to comply with.

PROJECT IMPACTS AND MITIGATION

Impact HYD-01: The proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Water quality within the Planning Area is regulated by federal, state, and local regulations. Although the Basin, in which the Planning Area is located, has a LLVGMP, this plan is voluntary and non-regulatory.

Although the proposed Project would not directly violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, development activities and new land uses facilitated by the Project may indirectly do so. However, the City of Willits Standards (2011) requires projects that disturb one (1) acre or more prepare and implement a SWPPP in accordance with the CGP. Additionally, projects that result in less than one (1) acre but are part of a larger common plan of development that totals one or more acre of land disturbance are required to obtain coverage under the CGP. The proposed Project may facilitate future development projects subject to the CGP. Compliance with the CGP requires operators of such construction sites to implement stormwater controls and develop a SWPPP identifying specific BMPs to be implemented to minimize the amount of sediment and other pollutants associated with construction sites from being discharged in

stormwater runoff. The CGP also requires post-construction BMPs to reduce runoff and pollutants in stormwater discharges.

Additionally, the proposed Project contains the following policies, which are either modified policies from the Vision 2020 Willits General Plan Revision (General Plan) adopted in 1992 or new policies, that would support protecting surface water and groundwater quality:

- **LU-1.1 Planning Area:** Request that applications for development or changes in organization within the Planning Area boundary received by Mendocino County and the Local Agency Formation Commission be referred to the City for review and comment and encourage the County to implement measures to protect areas within the Planning Area not planned for development, including the City watersheds and groundwater recharge areas. *(Source: New Policy)*
- **LU-9.1 Riparian Buffer Areas:** Streams, riparian areas and wetlands are valuable resources and should be conserved in areas planned for development. Require project applicants located adjacent to stream corridors to include appropriate measures for natural creek channel and riparian vegetation preservation, creek bank stabilization, and erosion and sedimentation prevention. *(Source: New Policy and relates to Conservation and Open Space Policies in Section 3.200 and Mitigation Measures 4.731 and 4.733)*

As development facilitated by the proposed Project would be required to comply with the CGP and City of Willits Standards (2011), and the proposed Project contains policies consistent with protecting surface water and groundwater quality, the proposed Project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. The impact would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Impact HYD-02: The proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that is may impede sustainable groundwater management of the basin.

The Planning Area obtains water through the City's water system from both surface water and groundwater. The two (2) surface water reservoirs that serve the water system, Morris Reservoir and Centennial Reservoir, have a total storage capacity of approximately 1,300 acre feet (AF). Additionally, groundwater wells serving the water system produced approximately 14.0 million gallons of groundwater in 2021 and 21.6 million gallons in 2022, and according to the Groundwater Operational Use Plan adopted by the Willits City Council in 2022, the water system may utilize an average of 8 million gallons per month (MGM) of groundwater for domestic purposes, unless an emergency situation occurs (City of Willits, 2022). In 2022, the water system, including surface and groundwater, produced approximately 299.1 million gallons, equating to an average of approximately 24.9 MGM. The estimated monthly demand for the water system is 18.7 MGM (LACO 2023).

As the estimated monthly demand is 18.7 MGM and the water system produced an average of 24.9 MGM in 2022, the water supply exceeds demand during a time of non-drought. If the system's surface waters were compromised, the 8 MGM of allocated groundwater would not be sufficient to cover the monthly demand. However, in times of emergency, the Willits City Council could approve an increase in use (City of Willits 2022). Additionally, the LLVGMP found that the Basin recovers quickly from declines in groundwater levels and did not identify overdraft issues in the Basin (LACO 2020). As the water system has sufficient water to serve the Planning Area during times of non-drought, and the City of Willits Council could approve an increase in groundwater usage during time of emergency, the water system would have adequate water supply to serve current demand and future development that may be facilitated by the proposed Project. Additionally, as groundwater in the Basin appears to recover quickly from declines, the proposed Project would not interfere with groundwater recharge or impede sustainable groundwater management. A less than significant impact would occur.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Impact HYD-03: The proposed Project would not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation, substantially increase the rate or amount of surface runoff, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows.

Erosion/Siltation

As the proposed Project may facilitate new development, there would be a potential for erosion during grading activities. However, new development within the Planning Area would be required to comply with the City of Willits Standards (2011) and CGP, which include erosion control specifications and BMPs.

Increased Surface Runoff

Although the Planning Area is largely developed with urban and suburban uses, the proposed Project may facilitate new development that may increase impervious surfaces. However, the City of Willits Standards (2011) requires projects that disturb one (1) acre or more to prepare and implement a SWPPP in accordance with the CGP. Additionally, projects that result in less than one (1) acre but are part of a larger common plan of development, such as the proposed Project, that totals one or more acre of land disturbance. are required to obtain coverage under the CGP. Compliance with the CGP requires that operators of such construction sites implement stormwater controls and develop a SWPPP identifying specific BMPs to be implemented to minimize the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. The CGP also requires post-construction BMPs to reduce runoff and pollutants in stormwater discharges. As new development would be required to comply with the City of Willits Standards (2011) and CGP, surface runoff from stormwater would not be substantially increased.

Polluted Runoff

As discussed above, new development facilitated by the proposed Project would not substantially alter the existing drainage pattern in a manner that would result in substantial erosion or siltation or substantially increase the rate or amount of surface runoff. Therefore, the proposed Project and development facilitated by the proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Impede/Redirect Flood Flows

Portions of the Planning Area are mapped as 100-year and 500-year flood zones, primarily in the northeastern portion of the Planning Area. The Sphere of Influence Areas and Land Use Change Areas containing flood zones would have the potential to facilitate additional residential development. However, new development within the Planning Area would be required to comply with Title 17 Sections 38 and 40 of the City of Willits Municipal Code, which regulates development in flood zones. New development within the Planning Area would also be required to comply with the City of Willits Standards (2011), which contain standards for stormwater drainage. As such, new development would be designed in a way to protect life and minimize property damage as well as avoid impeding or redirecting flood flows. Furthermore, the following new policy of the proposed Project would include a floodway overlay designation, which would protect channels for the free flow of storm waters:

- **LU-11.6 General Plan Land Use Map Overlay Designations:** The following overlay land use designations are applicable, in addition to the primary land use designation, to ensure protection for important resources, including streamside and historic areas, and hazards, such as floodways and floodplains.
    - Natural Hazard Area (-G). This overlay designation is intended for information purposes and is applied to lands subject to hazards that may include to excessive slopes, erosion, soil stability, seismic hazards, wildfire periodic inundation and other similar natural hazards to life, property, and the natural environment. for the protection of persons and property.
    - Conservation - Floodway (-FW). This General Plan overlay designation is intended for information purposes and is applied to waterways and primary drainage channels to indicate the need to protect channels for the free flow of storm waters and to indicate the presence of adjacent floodplains for the protection of persons and property.
    - Historical Resources (-H). This General Plan overlay designation is applied, for information purposes, to historical resources within the community. The intent of the Historical Resources classification is to encourage the preservation and enhancement of unique historical resources in the City of Willits.
    - Riparian Areas (-R). The purpose of this designation is intended to identify important stream and riparian areas where reasonable buffers should be applied to indicate the need to protect, as part of development review, sensitive fish and wildlife habitats and to minimize the potential for erosion, runoff, and interference with surface water flows and that balance to the greatest extent feasible resource protection and property rights. *(Source: New Overlay)*
    - Urban Reserve (-UR). The purpose of this designation is to protect from premature subdivision and development, urban lands or land within the Sphere of Influence not now developed to urban densities or adequately provided with urban services

but expected to develop to urban uses and densities when services are available. This designation is used where annexation is required for urban services and full build-out.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Impact HYD-04: The proposed Project and development facilitated by the proposed Project would not result in flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation.

Flood Hazard

Portions of the Planning Area are mapped as 100-year and 500-year flood zones, primarily in the northeastern portion of the Project Area. The Sphere of Influence Areas and Land Use Change Areas containing flood zones would have the potential to facilitate additional residential development. However, the City of Willits Standards (2011) requires projects that disturb one (1) acre or more prepare and implement a SWPPP in accordance with the CGP. Additionally, projects that result in less than one (1) acre but are part of a larger common plan of development, such as the Project, that totals one or more acre of land disturbance are required to obtain coverage under the CGP. Compliance with the CGP requires operators of such construction sites to implement stormwater controls and develop a SWPPP identifying specific BMPs to be implemented to minimize the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. The CGP also requires post-construction BMPs to reduce runoff and pollutants in stormwater discharges. Additionally, development located within a flood zone would be required to comply with Title 17 Sections 38 and 40 of the City of Willits Municipal Code, which regulates development in flood zones and requires that development and construction within flood zones be designed to withstand floods. As such, development facilitated by the proposed Project would not risk release of pollutants due to inundation in the flood zone.

Flooding can also occur within dam inundation areas. The dam inundation area for the dam located at Lake Emily runs along the northern border of the northernmost Sphere of Influence Area. This area is partially developed, and the remaining undeveloped area has constraints that leave little potential for new development. However, new development would be required to comply with the City of Willits Standards (2011) and CGP, as discussed above.

Tsunami

The Planning Area is not subject to risk of tsunamis, as the Planning Area is located approximately 25 miles east of the Pacific Ocean and is not located within a tsunami hazard zone.

Seiche

A seiche is a wave generated during earthquakes within enclosed bodies of waters, such as reservoirs or lakes. The Planning Area is not subject to risk of seiches, as the Planning Area does not contain large, enclosed bodies of water. The nearest enclosed bodies of water to the Planning Area are at least 1 mile from the Planning Area, including Twin Lakes, approximately 1 mile northwest, Lake Ada Rose,

approximately 1.7 miles northwest, and Morris and Centennial Reservoir, each approximately 2 miles southeast.

Pollutant Release

As discussed above, the proposed Project would not result in a significant risk of flood hazard, tsunami, or seiche. As such, the proposed Project would not result in a significant risk of release of pollutants due to inundation. A less than significant impact would occur.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Impact HYD-05: The Proposed Project and development facilitated by the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The LLVGMP (2020) is a voluntary and non-regulatory plan, and therefore, the proposed Project does not need to comply with it. No relevant water quality control plan or sustainable groundwater management plan to the Planning Area exists. However, the proposed Project and development facilitated by the proposed Project would not have a significant impact on groundwater supply or water quality due to compliance with federal, state, and local regulations discussed above. A less than significant impact would occur.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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Acronyms/Abbreviations

AF	Acre Feet
Aquifer 1	Holocene alluvial deposits aquifer
Aquifer 2	Pliocene to Pleistocene continental basin deposits aquifer
Basin	Little Lake Valley Groundwater Basin
BMP	Best Management Practice
CGP	Construction General Permit
CWA	Clean Water Act
DWR	California Department of Water Resources
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
FW	Floodway
G	Natural Area Hazard
Gpm	Gallons Per Minute
H	Historical Resources

LID	Low Impact Development
LLVGMP	Little Lake Valley Groundwater Management Plan
MGM	Million Gallons Per Month
MS4	Municipal Separate Storm Sewer System
NFIA	National Flood Insurance Act of 1968
NFIP	National Flood Insurance Program
NPDES	National Pollutant Discharge Elimination System
Porter-Cologne Act	Porter-Cologne Water Quality Control Act
R	Riparian Areas
RWQCB	Regional Water Quality Control Board
SGMA	Sustainable Groundwater Management Act
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TMDL	Total Maximum Daily Loads
UR	Urban Reserve

3.11 LAND USE AND PLANNING

This section summarizes land use characteristics such as land use pattern and major land use types and analyzes the impacts related to land use and planning from implementation of the Project in the Project Area. This section incorporates information and analysis from the 2021 City of Willits Urban Forest Management Plan, 2020 Little Lake Valley Groundwater Management Plan, 2017 Mendocino County Regional Transportation Plan, and the 2016 Willits Main Street Corridor Enhancement Plan.

SETTING

A. DEFINITIONS

City Limits– The City limits is the political boundary for land incorporated into the City of Willits which the city has land use authority over.

Sphere of Influence –A city's sphere of influence (SOI) is a planning and policy concept that outlines the geographical area beyond the city's boundaries over which the city may exert significant influence or control regarding development, land use, and services. Within the City of Willits Planning Area, the City is seeking to expand its Sphere of Influence (SOI) to allow the supply of land within the City to be expanded to accommodate potential future growth. Under the Cortese-Knox-Hertzberg (CKH) Local Government Reorganization Act of 2000, an SOI is defined as the likely physical boundaries and service area of a City, as determined by the Local Agency Formation Commission (LAFCo). The designation of lands within the SOI empowers the City to plan for potential annexation and the extension of services, essential components of community growth. The adoption of the City's SOI is mandated by state law and falls under the jurisdiction of the Mendocino LAFCo so the Proposed expansions to the City's Sphere of Influence in the Land Use Element, along with City Land Use Designations, are designed to support a potential Sphere of Influence Amendment application to the Mendocino LAFCo.

Planning Area – The Planning Area encompasses not only the land incorporated within the City's boundary but also the surrounding areas that hold significance in City planning. Defining this extended Planning Area serves as a means for the City to express its intentions regarding potential annexations and articulate its objectives and concerns concerning the future of neighboring lands under County jurisdiction. In the proposed City of Willits Planning Area, inclusion is based on factors such as the provision of utility services, including water, and, to a lesser extent, wastewater services. It also considers areas with existing utility infrastructure, such as the City's wastewater treatment plant, or infrastructure dependency, such as the watersheds supplying the City's reservoirs and hazard zones around the City's airport. It also encompasses areas where development could impact the City significantly, exemplified by the Little Lake Groundwater Basin, an important planning source and groundwater recharge area for the City's water supply. Within this Planning Area, the City intends to apply Land Use Designations and potentially adopt specific policies aligned with its interests and objectives.

Project Area – The Project Area is within the City of Willits Planning Area, which includes the Proposed Sphere of Influence Area, the entire City of Willits, and the proposed Land Use Change Areas within the City.

Areas of Interest – Mendocino LAFCo defines geographic areas beyond the SOI where land use or development actions of the County or a special district could directly or indirectly impact the City are called Areas of Interest. LAFCo has defined three areas of interest for the City of Willits beyond the City's SOI, including the Meadowbrook area, the north Main Street U.S 101 interchange and the South Main Street U.S 101 interchange.

Disadvantaged Unincorporated Community – A Disadvantaged Unincorporated Community (DUC) is defined by state law as an area that contains 12 or more registered voters and has an annual household income that is less than 80 percent of the statewide median household income.

General Plan Land Use Policy. California state law requires that each city and county adopt a general plan "for the physical development of the county or city and any land outside its boundaries which bears relation to its planning" (California Government Code, Section 65300). The plan is intended to be an expression of a community's values and its vision for the future, a "blueprint" for anticipated growth and development, both public and private, which forms the basis for most local government land-use decision making. General Plan Land Use Policies address the distribution, location and intensity of uses of land for housing, business, industry, natural resources, open space, recreation, and other uses. within the City.

Zoning Regulations – Zoning regulates development in accordance with the General Plan, using specific standards like lot size, setbacks, and permitted uses. Zoning regulations are not to be confused with General Plan Land Use designations. While both influence land development, they operate differently. The General Plan provides a long-term perspective, specifying permissible land uses, their density, spatial relationships, and the future development pattern. The General Plan diagram must be reflected in local zoning maps to ensure compliance with State law. Consequently, development must not only adhere to zoning code requirements but also adhere to the broader policies laid out in the General Plan. In summary, the General Plan informs the zoning code, but the reverse is not true.

B. Existing Land Use Designation

The City of Willits City limits encompasses approximately 2.82-square miles (1,804-acres) of land on the western edge of the Little Lake Valley. The City limits include the main City boundary as well as two island areas away from the main City boundary that include the Ells Field-Willits Municipal Airport and the city water treatment plant adjacent to the Morris Reservoir. The current 1992 General Plan Land Use Element outlines eight primary Land Use Designations that are applicable within the City limits, all of which are utilized within the City with the exception of the Agricultural - General (A-G) Land Use Designation. These designations set the parameters for permissible land uses within the City. In parallel, the Zoning Regulations establish Zoning Districts designed to align with the General Plan Land Use Map, while also defining use groups consistent with the allowable uses within the General Plan Land Designations. In addition to primary Land Use Designations, there are four Land Use Element Overlay Designations that may be applied on the Land Use Map: Natural Hazard Area (-G); Conservation - Floodway (-FW); Historical Resources (-H); and Riparian Areas (-R). Overlay designations are used in combination with the primary land use designations to ensure protection of important resources, including streamside and historic areas, and hazards, such as floodways and floodplains. A breakdown of the current land use designations and their percentage of total available land is shown in the following table.

Table 3.11a: Current Willits General Plan Land Use Designations

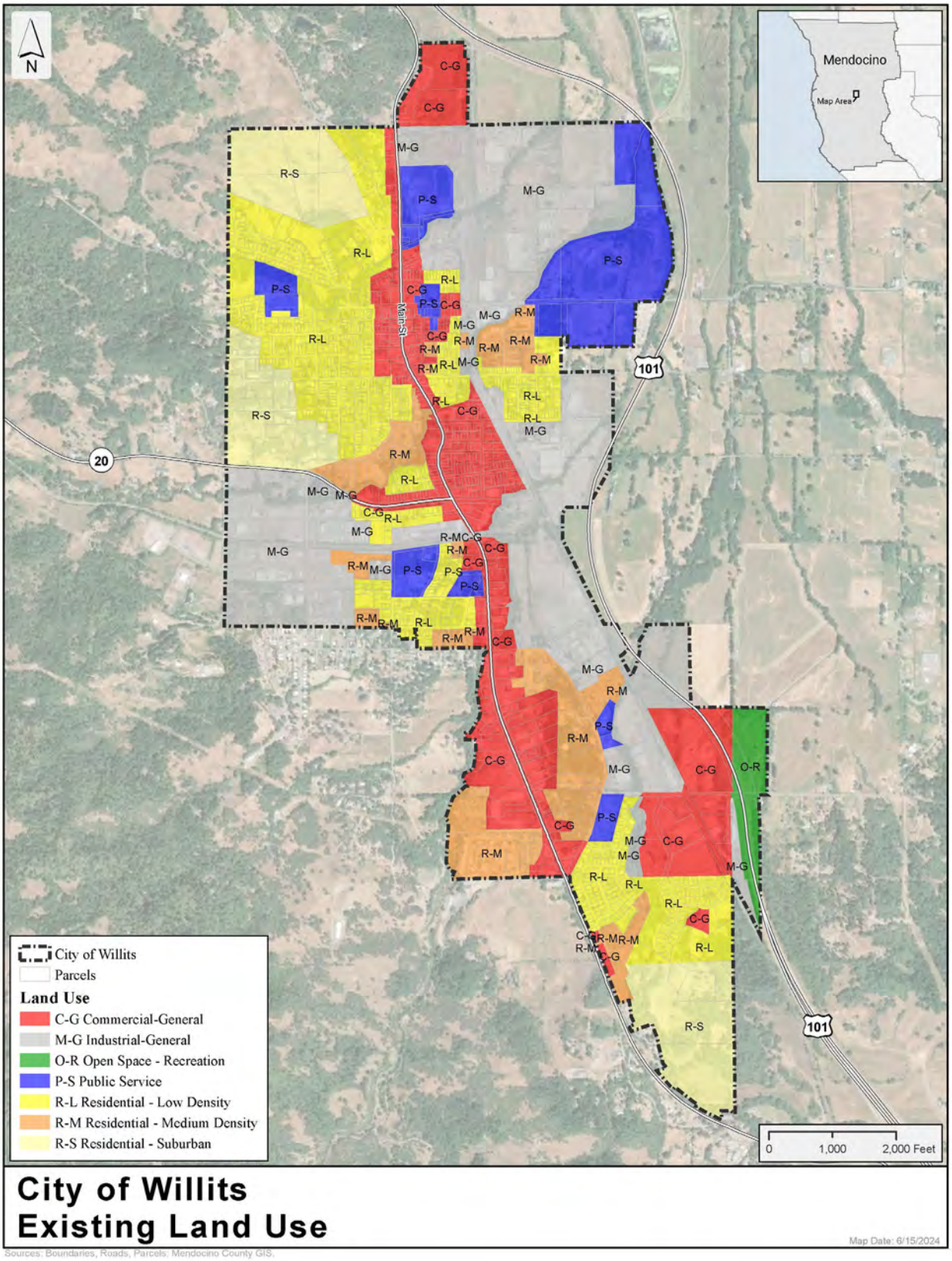
Residential-Suburban (R-S). This classification is for application to suburban or rural areas in which existing or desirable future parcel sizes, soils, topography and surrounding uses indicate single family developments on sites of 20,000 square feet or larger are appropriate with wells and/or septic tank sewage disposal. Consistent zoning may permit limited livestock raising, agriculture, and recreational uses subject to permit controls. **Maximum density:** one family per 20,000 square feet **Minimum parcel size:** 20,000 square feet
Residential-low Density (R-L) This classification is for application to extensive areas in and around the City in which the dominant use is, or is proposed to be, single family residential, where access and lot patterns are suitable for such use, and where urban services including water and sewer systems are installed or available. **Maximum density:** one family per 6,000 square feet **Minimum parcel size:** 6,000 square feet
Residential-Medium Density (R-M). This classification is for application to limited areas of mixed density residential uses or new development areas most suitable for duplexes, multi-family, apartment or professional office uses, where all urban services are available, and where schools, parks, commercial facilities, etc. are in convenient proximity. **Maximum density:** one family per 1,500 square feet **Minimum parcel size:** 6,000 square feet
Commercial-General (C-G). This classification is for areas which are used for administrative office, general commercial, and heavy commercial purposes, or which are proposed for such use in the future because of location, access, need, and service potential. Such areas may be for local neighborhood service, for central business districts purposes, or for highway traffic services. **Maximum density:** per appropriate zoning **Minimum parcel size:** per appropriate zoning
Industrial-General (M-G). This classification is for application to land areas which are best suited for a variety of industrial operations because of access, location, availability of power, water, sewer services and transportation facilities, and where their operations will be compatible with adjacent uses. Zoning regulations must be applied in relation to the particular operations to ensure freedom of operation without detrimental impact upon adjacent uses. **Maximum density:** per appropriate zoning **Minimum parcel size:** per appropriate zoning
Public Service (PS). This classification is for application to public sites of schools, parks, civic centers, fairgrounds, airports, museums, libraries, auditoriums, corporation yards, hospitals, social service centers, and similar uses, and may be applied to quasi-public and public utility sites.
Open Space - Recreation (0-R). This classification is for application to sites which are to be used primarily for open space and/or recreation purposes.

Agricultural - General (A-G). This classification is for application to areas which are suitable for agricultural production because of historical use or future potential based on soil capability.
Conservation - Floodway (FW). This classification is for application to waterways and primary drainage channels to indicate the need to protect channels for the free flow of storm waters and to regulate the use of land in adjacent floodplains for the protection of persons and property. Lands designated FW are· shown on Exhibit 9-1. For information purposes, they are also shown on the General Plan display map.
Historical Resources (H). This classification is for application to historical resources within the community. The purpose of the Historical Resources classification is to encourage the preservation and enhancement of unique historical resources in the City of Willits. Lands, designated Hare shown on Exhibit 10-1. For information purposes, they are also shown on the General Plan display map.

Source: (City of Willits, 1992)

The existing land use pattern within the City of Willits is diverse, characterized by a concentration of commercial activities in the historic downtown and South Main Street areas, industrial zones on the eastern side, and residential neighborhoods encompassing the downtown region, as well as the western and southern sections of the city. A majority of the City is planned and used for residential land use, predominantly low density residential. A breakdown of land uses, guided by the Assessor's Land Use Code applied to each parcel, reveals that while 30 percent of the City is designated for industrial purposes, only 10 percent of the actual land is used for industrial activities. This is partly attributed to a significant portion of U.S. 101 being designated for Industrial-General (M-G) use, along with a considerable number of vacant industrial parcels. Similarly, nearly 20 percent of the City is planned for Commercial General (C-G), yet only 8 percent of the land is currently utilized for commercial purposes. This can be attributed to the presence of single- and multiple-family residences within many parcels designated as "C-G." A map of existing land use is shown on the next page.

Figure 3.11a: Existing General Plan Land Use Map



The City of Willits has an SOI that is located on the west side of the City and covers 12 acres in area and consists almost entirely of small lots that are developed with manufactured homes. There are 61 Assessor's parcels in the existing SOI with 57 landowners, four of which own two parcels each. Of these parcels, 58 are improved with single family dwellings or manufactured homes and three are vacant with one of the vacant parcels serving as yard area for an adjacent manufactured home. This area is identified as a DUC on the CALAFCO Statewide DUC Map. The Planning Area and the existing SOI are shown in the following map.

C. Existing Zoning

Willits Municipal Code Section 17 comprises the City Zoning Regulations and Sections 17.08.010 and 17.08.020 establish 14 Primary Zones and six Combining Zones within the City. For each primary zone, the regulations define the principally and conditionally permitted uses and the lot regulations which define the minimum lot size characteristics (such as minimum size and dimensions), maximum ground coverage, minimum setbacks, and maximum building height. The Zoning Regulations also specify additional requirements for combining zones to protect sensitive resources from development, or to protect development from hazards. The zoning classifications are described in the tables below and shown in the map shown in Figure 3.11c.

Figure 3.11b: City of Willits Planning Area and Existing and Proposed Sphere of Influence

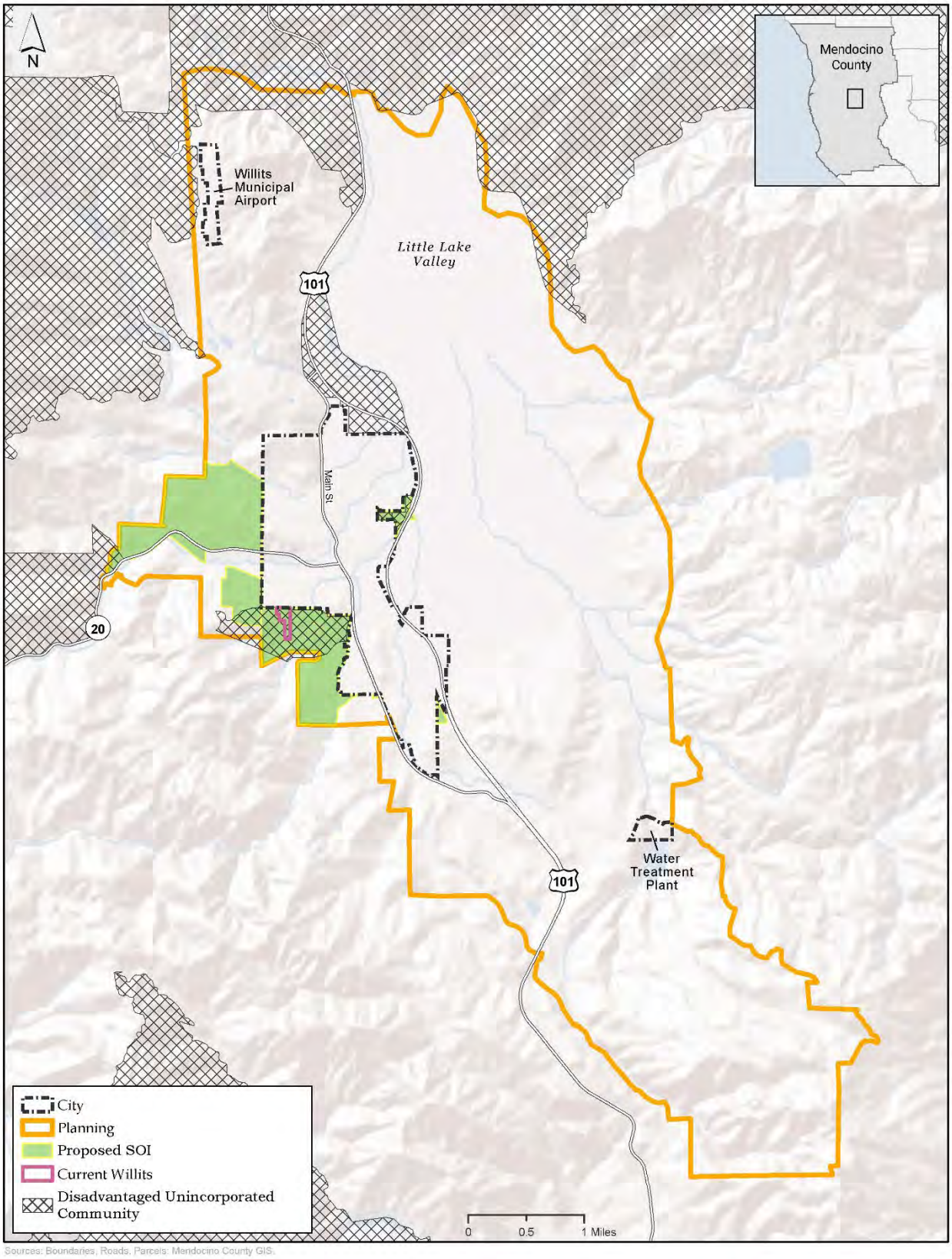


Table 3.11b: City of Willits Primary Zones

Zone	Symbol	Description
Agriculture	A	This zone is intended to preserve lands best suited for agricultural use from the encroachment of incompatible uses, and to preserve in agricultural use land suited to eventual development in other uses, pending proper timing for the economical provisions of utilities, major streets and other facilities, so that compact, orderly development will occur.
Residential Estates	RE	This zone is intended to promote and encourage environment for family life on large parcels of land.
Single-Family Residence	R1	This zone is intended to stabilize and protect residential characteristics and to promote and encourage a suitable environment for family life which single-family dwellings and appurtenant uses.
Medium-Density Residence	R2	This zone is intended to stabilize and protect residential characteristics, and to promote intermediate density residential development
Multiple-Family Residence	R3	This zone is intended to stabilize and protect residential characteristics and to promote higher-density residential development
Administrative Office	CO	This zone is intended to provide professional, business and related services in areas adjacent to city administrative and medical centers.
Community Commercial	C1	This zone is intended to provide services and meet the general commercial needs of the community.
Heavy Commercial	C2	This zone is intended to provide services and commercial facilities of a heavier nature than in the community commercial (C1) zone.
Limited Commercial	ML	This zone is intended to apply to areas in which light manufacturing and heavy commercial *uses* of a non-nuisance type and large administrative facilities are the desirable predominant uses.
Heavy Industrial	MH	This zone is intended to apply to areas devoted to normal operations of industries, subject only to such regulations as are needed to control nuisances and protect surrounding areas.
Industrial Park	IP	This zone is intended to provide for the development of landscaped industrial parks which serve a variety of uses emphasizing low building concentration and suitable open space.
Public Facility	PF	This zone is intended to be applied to properties which are properly used for, or are proposed to be used for, public purposes or for specified public utility purposes.
Open Space	OS	This zone is intended to preserve land in its natural state, or to provide open space buffer areas in which uses are restricted to recreational, conservation or light agricultural types.

Table 3.11b: City of Willits Primary Zones

Zone	Symbol	Description
Unclassified	U	This zone is intended to be applied on an interim-period basis to lands which are substantially undeveloped, which have no particular use character established, or which are in transition from an agricultural or other general use to more urban types of uses. The U zone is to be considered a temporary holding zone which will be replaced by precise primary zones as determined on the basis of zoning studies

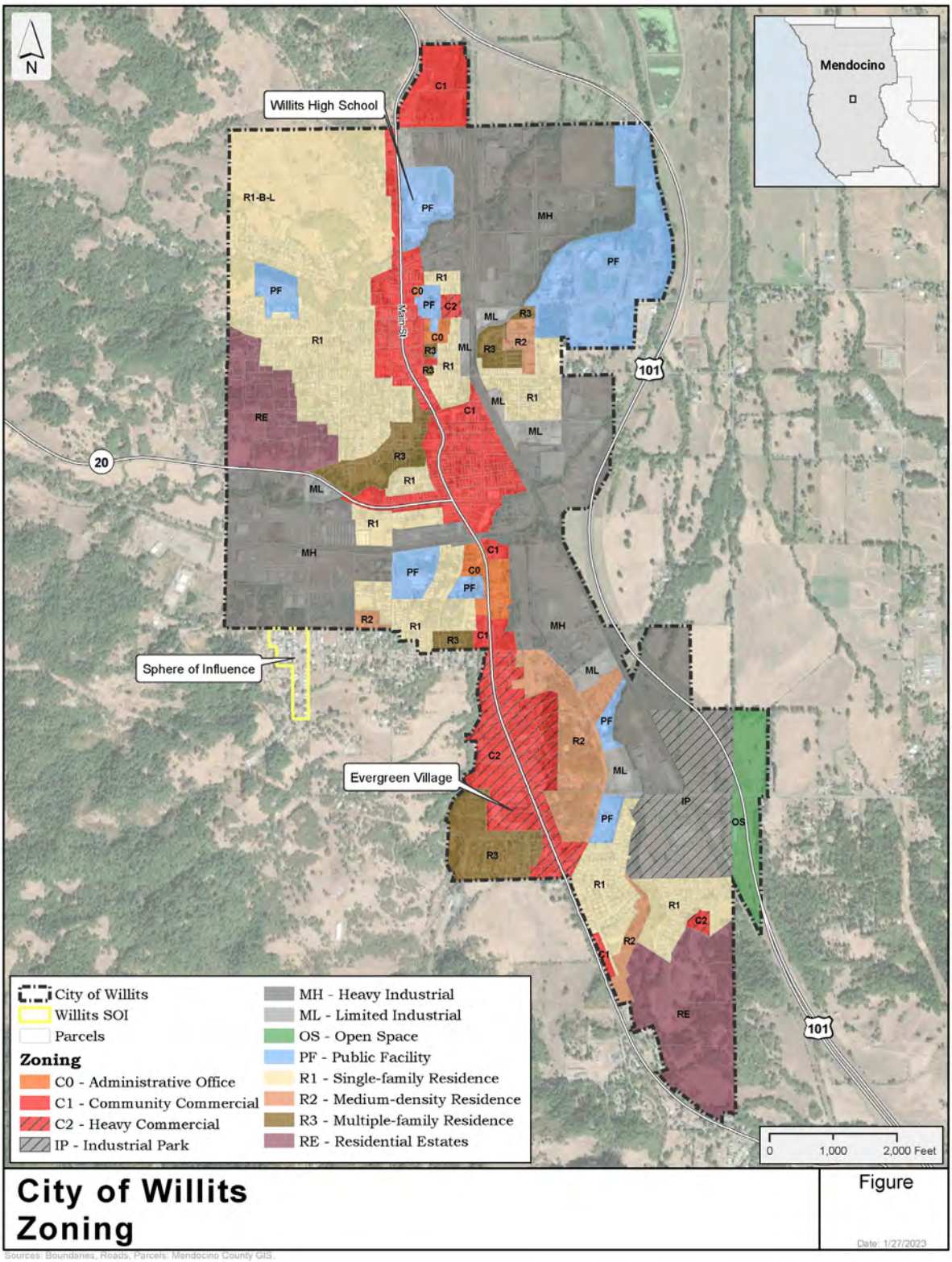
Source: (City of Willits, 2023)

Table 3.11c: City of Willits Combining Zones

Combining Zone	Symbol	Description
Planned Unit Development	-PD	This zone is intended to allow flexibility in development by absolving tracts of land from the strict application of conventional zoning rules; to permit clustering of residential and other structures in order to increase open space and promote variety in layout; and to encourage living and working environments superior to those possible under primary zoning regulations.
Floodway	-FW	This zone is intended to provide for passage of one-hundred-year base floodwaters, and to provide reasonable measures for protection of life and property, in areas which are extremely hazardous owing to velocity of floodwaters, debris and erosion potential.
Floodplain	-FP	This zone is intended to provide regulations which will protect life and minimize property damage in areas of special flood hazard subject to inundation during a one hundred-year base flood.
Seismic Study	-SS	This zone is intended to be applied to parcels of land identified as a Seismic Study Zone by the California Division of Mines and Geology pursuant to the Alquist-Priolo Act.
Special Lot Size	-B	This zone and subzones thereunder are intended to be combined with any principal zone in locations where sound and orderly planning indicates that lot area requirements should be modified.
Natural Hazard	-H	This zone combined with any basic zone is intended to recognize and reduce natural hazards related to land slope, erosion, soil stability, seismic action, wildfire, periodic inundation and other similar natural hazards to life, property and the natural environment.

Source: (City of Willits, 2023)

Figure 3.11c: Existing Zoning Districts



C. Existing Plans

Regional

Mendocino County Multi-Jurisdictional Hazard Mitigation Plan

The Mendocino County Multi-Jurisdictional Hazard Mitigation Plan is a strategic document developed collaboratively by multiple local jurisdictions within Mendocino County, California. It aims to assess and address various hazards, including natural disasters such as wildfires, floods, and earthquakes, to reduce the impact of these events on the community. The plan outlines risk assessments, mitigation strategies, and emergency response coordination efforts among participating jurisdictions, all with the goal of minimizing vulnerabilities and enhancing the region's overall resilience to disasters.

Mendocino County Regional Transportation Plan

The Mendocino County Regional Transportation Plan is a comprehensive document that outlines the long-term vision and strategies for transportation in Mendocino County, California. It covers various modes of transportation, including roadways, public transit, cycling, and pedestrian infrastructure. The plan aims to improve mobility, safety, and sustainability within the county while addressing transportation challenges and opportunities. It typically sets out goals, objectives, and priority projects to guide transportation development and investment over an extended planning horizon. The plan is a crucial tool for coordinating transportation efforts, securing funding, and ensuring the efficient movement of people and goods in Mendocino County.

Mendocino County Airport Comprehensive Land Use Plan

The Mendocino County Airport Comprehensive Land Use Plan was created in 1996 to outline the long-term development, land use, and operational plans for an airport and its surrounding areas. This plan covers various aspects, including infrastructure improvements, environmental considerations, and safety measures. The Ells field portion of the plan has not been updated but there was a 2021 update to the plan for the Ukiah Municipal Airport.

Regional Housing Needs Plan

The Mendocino Regional Housing Needs Plan is a comprehensive document developed to address the housing needs of the Mendocino County region in California. It assesses the demand for housing across different income levels and identifies strategies and policies to meet these needs. The plan is a critical component of local and regional planning efforts, ensuring that adequate and affordable housing options are available to the community, addressing homelessness, and promoting equitable and sustainable housing development.

City of Willits Municipal Service Review and Sphere of Influence Update 2019

The Mendocino LAFCo prepared the City of Willits Municipal Service Review (MSR) and Sphere of Influence Update in 2019 (Resolution No. 2018-19-10), which is a comprehensive analysis of the services provided by a local government agency to evaluate the capabilities of that agency to meet the public service needs of their current and future service area. The MSR considers factors such as land use, growth, infrastructure, and governance. LAFCo uses the MSR to ensure efficient and effective service delivery while establishing the appropriate boundaries and responsibilities for the city's sphere of influence.

CITY OF WILLITS

Willits Urban Forest Management Plan

The Willits Urban Forest Management Plan (UFMP) was created in 2021. It serves as a foundational guide for implementing effective management practices and policies, aiming to cultivate a robust and sustainable urban forest. By fostering a sustainable urban forest, the City aims to create resilient communities better equipped to adapt to the challenges posed by climate change. The plan emphasizes the role of urban forests in providing cooling effects during extreme heat, managing stormwater, and improving air quality. Through a thorough analysis of management practices, policies, ordinances, and funding, the City identified strengths and deficiencies, leading to the completion of the UFMP, inventorying street and park trees, and prioritizing tree planting and maintenance in disadvantaged communities.

Willits Main Street Corridor Enhancement Plan

The Willits Main Street Corridor Enhancement Plan was developed in 2016. It is a strategic urban development initiative aimed at revitalizing and enhancing the visual and functional aspects of the Main Street corridor in Willits, California. This plan focuses on promoting economic growth, community engagement, and sustainable development, with an emphasis on improving infrastructure, public spaces, and overall aesthetics. It includes elements such as improved sidewalks, landscaping, public art, and traffic management to create a more vibrant and pedestrian-friendly environment in the heart of the city.

City of Willits Downtown Design Guidelines

The City of Willits Downtown Design Guidelines was created in 2009 and further updated in 2011. It is a set of standards and recommendations designed to guide and regulate the architectural and aesthetic aspects of development in the downtown area of Willits, California. These guidelines provide a framework for maintaining and enhancing the historic and visual character of the downtown district, ensuring that new construction and renovations align with the city's unique architectural heritage. They cover elements such as building design, signage, landscaping, and public spaces, encouraging a cohesive and attractive downtown environment that promotes economic vitality while preserving the city's small-town charm.

City of Willits Bicycle and Pedestrian Specific Plan

The City of Willits Bicycle and Pedestrian Specific Plan was prepared in 2009. It is a strategic document designed to improve and promote safe and accessible biking and walking infrastructure within the city. This plan outlines a comprehensive network of pathways, bike lanes, and pedestrian-friendly facilities, with a focus on enhancing mobility, safety, and the overall quality of life for residents and visitors. The plan includes recommendations for connecting key destinations, improving intersections, and creating a more sustainable and active transportation environment in Willits.

Downtown Specific Plan

The Willits Downtown Specific Plan is a planning document from 2000 that outlines a comprehensive strategy for the development and revitalization of the town's downtown area. This plan addresses specific guideline, goals, and recommendations related to zoning, land use, transportation, infrastructure, and other factors that contribute to the downtown's overall character and functionality. The plan addresses issues on downtown Main Street related to parking strategies, placemaking, and design ideas. The goal

is to create a vibrant and economically thriving downtown district while preserving the town's unique identity and promoting sustainable growth.

Willits Circulation and Parking Improvement Plan

The Willits Circulation and Parking Improvement Plan was drafted in 2002 and is a strategic document that focuses on addressing traffic circulation and parking challenges in the City of Willits. It includes recommendations and initiatives to improve roadways, reduce congestion, enhance pedestrian and bicycle infrastructure, and provide more efficient and accessible parking solutions. The plan aims to create a more convenient and attractive transportation environment for residents and visitors, ultimately supporting the town's economic vitality and livability.

Willits Downtown Streets and Alleys Connectivity Study

The Willits Downtown Streets and Alleys Connectivity Study is a study from 2017 aimed at examining and enhancing the connectivity of streets and alleys within the downtown area of Willits. It involves assessing the layout, condition, and potential use of these public spaces to create a more cohesive and pedestrian-friendly downtown environment. The study seeks to improve the flow of people and vehicles, revitalize the downtown area, and create a more vibrant and interconnected urban core.

Baechtel Road – Railroad Avenue Corridor Community Design Study

The City of Willits Baechtel Road – Railroad Avenue Corridor Community Design Study is an urban planning initiative developed in 2004 that focused on improving the Baechtel Road to Railroad Avenue corridor. It involves community input and professional analysis to develop design recommendations for enhancing transportation, land use, aesthetics, and overall urban design along this corridor. The goal is to create a more visually appealing, functional, and accessible route while taking into account the needs and preferences of the local community.

REGULATORY SETTING

FEDERAL

Federal Aviation Administration

A Military Operating Area (MOA) is a designated segment of airspace where military aircraft conduct training exercises and operations (14 CFR §1.1, U.S.A.). The regulations governing MOAs are set by aviation authorities, such as the Federal Aviation Administration (FAA) in the United States. MOA’s are established outside Class A airspace to separate nonhazardous military activities from IFR Traffic and inform VFR traffic of these activities' location. MOAs are a form of special use airspace (SUA), different from restricted or prohibited airspace, and are used for military maneuvers. They're marked on charts, including operational hours, altitudes, and contact information. MOAs are typically located in remote areas to mitigate noise and safety concerns. Local flight service facilities maintain MOA details, serving to ensure safe airspace usage and segregation of military activities from civilian aviation.

STATE

California Government Code

California Government Code Section 65300 regulates the substantive and topical requirements of general plans. State law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." The California Supreme Court has called the general plan the "constitution for future development." The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private.

California Government Code Section 65301 requires a general plan to address the geographic territory of the local jurisdiction and any other territory outside its boundaries that bears relation to the planning of the jurisdiction. The jurisdiction may exercise their own judgment in determining what areas outside of its boundaries to include in the Planning Area. The State of California General Plan Guidelines state that the Planning Area for a city should include (at minimum) all land within the city limits and all land within the city's Sphere of Influence.

Cortese Knox Hertzberg Local Government Reorganization Act of 2000

The Cortese Knox Hertzberg Local Government Reorganization Act (CKH Act) is the most significant reform to local government reorganization law since the 1963 statute that created a LAFCo in each county. The law established procedures for local government changes of organization, including city incorporation, annexation to a city or special district, and consolidation of cities or special districts (California Government Code Section 56000, et seq.). LAFCos have numerous powers under the CKH Act, but those of prime concern are the power to act on local agency boundary changes and to adopt spheres of influence for local agencies. The law also states that in order to update a Sphere of Influence (SOI), LAFCOs are required to first conduct a review of the municipal services provided in the county.

While LAFCo does not have any direct land use authority, the CKH Act assigns LAFCos a significant role in planning issues by requiring them to consider a wide range of land use and growth factors when they consider proposals. California Government Code Section 56001 specifically states that "the logical formation and determination of local agency boundaries is an important factor in promoting orderly development and in balancing that development with sometimes competing State interests of discouraging urban sprawl, preserving open space and prime agricultural lands, [and] efficiently extending government services."

The CKH Act also requires LAFCos to update spheres of influence for every city and special district every five years. The original deadline was January 2006, five years following the CHK Act becoming State law. That deadline was extended two years to January 2008. Every SOI update must be accompanied by an update of the municipal services review. Pursuant to Government Code Section 56430, Mendocino LAFCo conducts municipal service reviews for each agency under its jurisdiction.

The municipal service reviews provide an in-depth look at provider service needs, use of resources, and possibilities for partnership with other agencies; and contain determinations that serve as guidelines to inform and support the LAFCo's decisions about Spheres of Influence. The Mendocino LAFCo updated the City of Willits MSR and SOI in 2019, and an application to expand the City Sphere of Influence is a part of the proposed Project. (Mendocino County, 2023).

REGIONAL AND LOCAL

Mendocino County Regional Transportation Plan

The 2017 Mendocino County Regional Transportation Plan (RTP), adopted in February 2018, is a plan outlining the Mendocino County Council of Governments' strategies for operating, managing, maintaining, and financing the region's transportation system in a way to advance the long-term goals of the communities within Mendocino County and the state of California. The RTP emphasizes a strategy of investing transportation funds and coordinating land use planning efforts to bring greater mobility and access to services for Mendocino County residents. Goals and policies within the RTP include coordinating land use and public investments in a way that improves accessibility to services, employment, and housing, and encouraging local entities to direct private development to priority urbanized areas where services can best be provided at lowest public cost and least environmental consequences (Mendocino County Council of Governments 2018).

Mendocino County General Plan

State law requires that the following seven topic areas be addressed in a General Plan: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. This General Plan arranges these topics into four main sections, called "Elements," organized into Development, Resource Management, Housing, and Coastal, plus sections on Community-specific policies. In order to address all land use development-related topics in a consolidated chapter, the County has exercised its discretion to combine the Land Use (Govt. Code §65302(a)), Circulation (Govt. Code §65302(b)), Noise (Govt. Code §65302(f)), and Safety (Govt. Code §65302(g)) Elements into this Development Element. The City of Willits is one of the communities described within the Community-Specific Policies.

The following are the County of Mendocino's Goals related to the various topics addressed in this Development Element as it pertains to Land Use in the planning area:

- Goal DE-1 (Land Use) Land use patterns that maintain the rural character of Mendocino County preserves its natural resources and recognizes the constraints of the land and the limited availability of infrastructure and public services.
- Goal DE-2 (Land Use) Compact and cohesive commercial centers to foster commercial growth creates communities that are pleasant to live in, which encourage walking, and which allow the provision of cost-effective services and facilities.
- Goal DE-3 (Land Use) Industrial sites and uses (including resource-based industries) located and designed to minimize conflicts with surrounding land uses, minimize environmental degradation and risk from natural and human-made hazards, and protect natural resources.
- Goal DE-4 (Land Use) Functional, safe, and attractive communities compatible with the General Plan and community objectives, infrastructure availability, and environmental, safety, economic, and other opportunities, and constraints.

The Community-Specific Policies for the Willits Community Planning Area include:

- Policy CP-W-2: The County will work with the City of Willits to create a unified community encompassing urban development both within and adjacent to the City.
- Policy CP-W-3: Residential uses in the unincorporated area should be focused in areas south of the City of Willits and in the Brooktrails Township (as supported by necessary water and sewer service connections).

Mendocino County Regulations

Title 20 of the Mendocino County Code contains the Mendocino County Zoning Code—Division I, which includes regulations and provisions related to land use, development, and zoning districts within the

County. The Division 1 Zoning Code outlines the rules and guidelines for how land can be used, what types of structures can be built, and the overall development standards for different areas within the County exclusive of those areas within the Coastal Zone. This Division is intended to be in harmony with the Mendocino County General Plan and any area plans adopted pursuant thereto. It covers aspects such as zoning districts, permitted land uses, setbacks, building heights, parking requirements, and other regulations that shape the physical and functional characteristics of the county's various regions.

Willits General Plan

California planning law requires Cities to adopt a general plan for lands within its limits and any land outside of its boundaries which bears relation to its planning. A city's General Plan contains policies, programs and diagrams, arranged in the following required "Elements": land use, circulation, housing, conservation, open space, noise, and safety. The General Plan is intended to provide for the identification of land for housing, commerce, industry, and public services, the protection of natural resources, the identification of hazards, the provision of municipal services and serves as the "constitution" for developing land within the city. General Plans typically look forward twenty years to provide for existing and planned development. The Land Use Element of the General Plan is among the most important and identifies how land can be used (allowable uses and the intensity of development) and the distribution of the uses within the City. The City of Willits Land Use Element was last updated in 1992.

State planning law requires that a city's zoning be consistent with the city General Plan – an arrangement where the General Plan serves the "constitution" and zoning is the "law" that carries it out. To implement the General Plan, the zoning map and regulations divide a community into districts and establish regulations for what can and cannot be built on land within those districts. To define what can be built, zoning regulations address two issues: (1) the height, bulk, and sometimes design of buildings (i.e., how big they are and how they look), and (2) to what use the buildings may be put (i.e., what activities can take place).

Willits Municipal Code

Title 17 of the Willits Municipal Code details the Willits Zoning Regulations which encompasses regulations for development within the city. It specifies the various zoning districts, the permitting of land uses, development standards, and procedures for land use planning and development within the city's jurisdiction. This chapter is designed to guide the orderly growth and development of the city while ensuring compatibility with the surrounding environment and promoting the general welfare of the community. The zoning districts only apply to land within the City limits and the standards serve to preserve the character and integrity of existing neighborhoods. Within a typical district there are regulations related to land use, lot size, coverage, setbacks, building heights, parking, and landscaping.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, impacts related to land use and planning from implementation of the project would be significant if it would:

a) Physically divide an established community?
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Land Use impact assessment was conducted focusing on the compatibility of land uses identified in the Land Use Element with applicable land use plans, policies, or regulations adopted for the purpose of

avoiding or mitigating environmental impacts. This section also analyzes whether development facilitated by the project, or its proposed policies would physically divide communities.

PROJECT IMPACTS AND MITIGATION

Threshold LU-01: Would the project physically divide an established community?

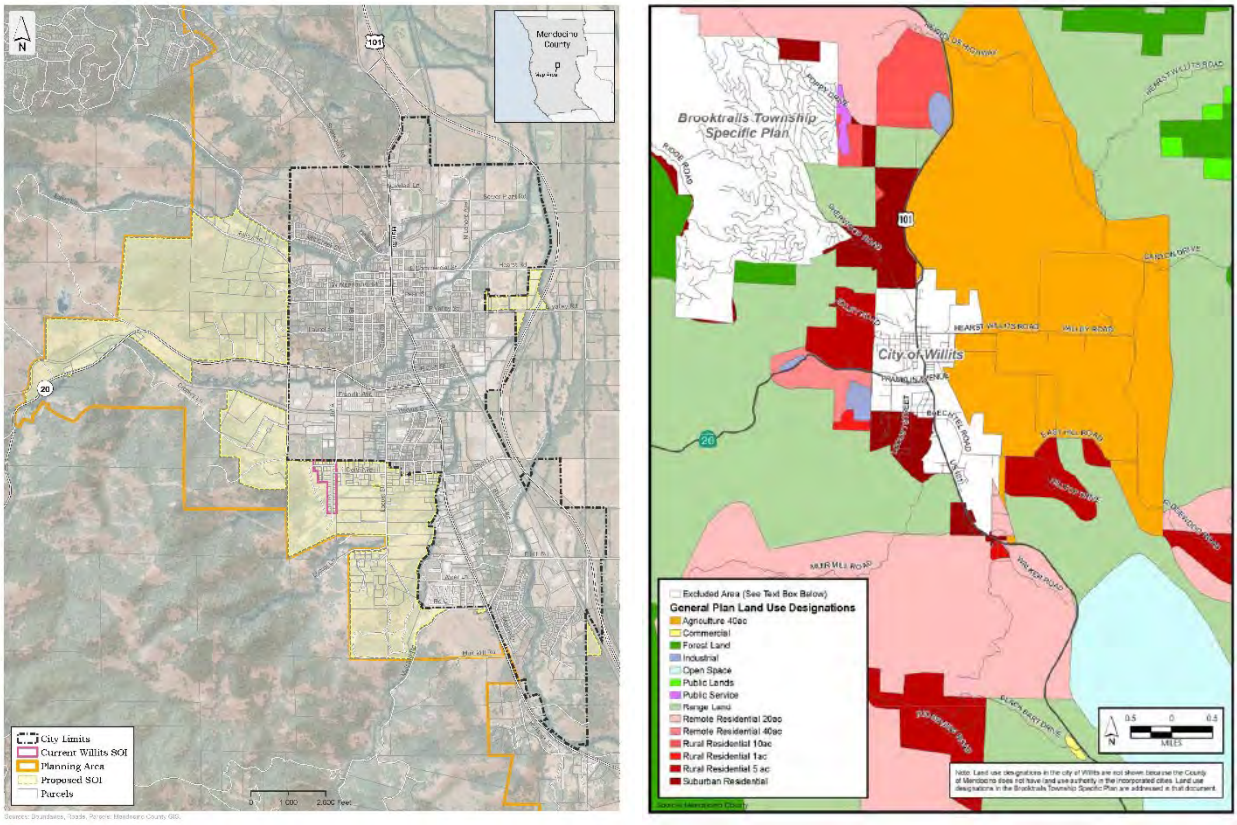
Impact LU-01: Implementation of the Land Use Element would update land use designations to current land use conditions ensuring orderly development in the Project Area and would not physically affect an established neighborhood, therefore impacts are anticipated to be less than significant.

The City of Willits has experienced gradual development over the years, a substantial portion of development in the City may predate the implementation of City Zoning Regulations. Historical development has given rise to non-conforming structures and land uses that have become integral components of the neighborhood's character. A majority of land within City boundaries is currently developed and contains commercial, industrial, and residential uses. Existing commercial development is predominantly situated in the historic downtown area and along South Main Street. Industrial zones are located to the east side of the City along the railroad right of way and in the west near S.R. 20. Residential neighborhoods are spread throughout the west and south sides of the City in addition to areas surrounding downtown. Single Family Residential parcels make up 26% of City land while Multiple Family Residential parcels make up an additional 10%. Vacant parcels comprise 28% of land within the City. Development in the City of Willits has occurred over time and in many instances was constructed before the adoption of City Zoning Regulations resulting in non-conforming structures and uses that are part of the neighborhood fabric.

The Land Use Element guides how land may be developed by specifying the types of land uses that will be allowed and the density and intensity of uses, the spatial relationships among land uses. Land use designations are intended to provide for the desired land uses within the City. The Land Use Element is also intended to plan land uses within the City's SOI to facilitate future annexation as well currently developed areas to allow for the preservation of the City's small-town character and maintain the surrounding agricultural, rural, and open space lands.

The proposed Land Use Map includes proposed changes initiated by the City, changes prompted by property owner land use requests, and land use "clean ups" where the long-time, established, land uses are inconsistent with the Land Use Designation applied in 1992 or earlier. The Land Use Map also includes proposed additions to the City's SOI to be submitted to the Local Agency Formation Commission (LAFCo) for consideration of approval. Proposed expanded SOI are predominantly on the west side of the City in areas the County has designated as either planned for Rural Residential, Remote Residential, Suburban Residential, Industrial, or Rangeland land use. There is a proposed SOI on the eastern side of the City that is designated Agricultural by the County that currently has public services buildings and several single-family homes.

Figure 3.11d: City of Willits Proposed Sphere of Influence and Excerpt Land Use Map from the Mendocino County Development Element



The proposed Land Use Element update plans for the same level of growth as the current General Plan, approximately 7,500, and Policy LU-2.2, Infill Development, prioritizes infill development in already developed and served areas before pursing annexation, which based on Policy LU-2.4, Annexations, would occur based on a limited supply of land within the existing boundaries and where annexations would support the preservation of open space lands, promote orderly development an appropriate mix of land uses, minimizes vehicle trips by promoting walking, bicycling, and transit. Goal LU-6, seeks to provide Zoning flexibility to maintain long-standing uses (Policy LU-6.3, Protect Long-Standing Compatible Uses in Older Neighborhoods) and provide compatibility between new uses and existing neighborhoods (Policy LU-6.1, Limit Incompatible and Conflicting Uses and Policy LU-6.2, Compatible Development). In addition, Goal LU-3, promotes neighborhood vitality, health, energy efficiency, and conservation and contains Policy LU-3.1, Complete Streets, which seeks to enhance the street network for walking and biking and create a comprehensive, integrated transportation network that is safe, accessible, comfortable Complete streets accommodate and welcome users of all ages, races, ethnicities, incomes, and physical abilities, and all modes of transportation, particularly those walking, biking, and using transit.

These policies and implementation measures ensure that the City maintains the existing communities and ensure that established communities are not divided. Therefore, the project would not physically divide an established community and implementation of the Land Use Element is anticipated to have less than significant impacts. The Land Use Element does contain a policy that is intended to improve transportation connectivity and seeks to establish a new north-south connector, ideally through an

undeveloped area between Baechtel Road and Railroad Avenue. This identified route would provide better connections between neighborhoods and downtown and would not physically divide a community.

These policies would maintain existing neighborhoods in the City of Willits and would ensure that established communities would not be divided. Policies are intended to prioritize infill, ensure orderly development, and avoid land use incompatibilities, which would prevent division of existing communities. Additionally, Policy LU-3.4, Improve North-South Connectivity, seeks to improve neighborhood connectivity and not divide existing communities. Therefore, the project would not physically divide communities within the City of Willits or the SOI. Impacts would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold LU-02: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-02: The Land Use Element takes into consideration existing plans, policies, and regulations to create cohesive policies and implementation measures for the Willits Project Area. Therefor the impact of Project implementation is expected to be less than significant.

There are several regionally and locally adopted plans, policies, and regulations that apply to this Project Area. These include the current General Plan Elements that are not included in this Land Use Element Update, Mendocino Regional Transportation Plan (RTP), Mendocino County Air Quality Management District 2005 Particulate Matter Attainment Plan, and the Mendocino County Airport Comprehensive Land Use Plan, The proposed Land Use Element contains a series of policies and implementation measures intended to update the City's land use designations to current land use and expand compatible housing opportunities without dividing an established community.

The following are land use plans, policies, and regulations that the Land Use Element is subject to along with discussion on how cohesive they are with proposed policies or measures within the Land Use Element.

Mendocino County Regional Transportation Plan

- The Regional Transportation Plan has multiple objectives and policies addressed by the proposed Land Use Element. One such objective is to encourage local entities to direct private development to priority urbanized areas where services can best be provided at lowest public cost and least environmental consequences (Davey-Bates Consulting, 2018). The proposed Land Use Element is consistent with this objective through proposed policy LU-2.2 Infill Development.
- Another objective from the Regional Transportation Plan aims to incorporate bicycle, pedestrian and transit improvements when planning roadway improvements, unless the roadway is exempt by law, or the project receives a specific waiver authorized through a local, public process, or for

basic maintenance and rehabilitation activities (Davey-Bates Consulting, 2018). The proposed Land Use Element addresses this plan with proposed policy LU-3.1 Complete Streets and LU-5.2 South Main Street Improvements. Policy LU-5.2 encourages cooperation with property owners and Caltrans, develop and implement street design standards, including lane configuration, coordinated landscaping, signage, street lighting, benches, wider sidewalks, safe crossings, and bike lanes, to enhance and beautify the streetscape and building frontages to support businesses and to provide a safer, and more enjoyable atmosphere for shopping, walking, biking, outdoor seating and gathering, consistent with any City Complete Streets policies.

Mendocino County Airport Comprehensive Land Use Plan

- Under the Mendocino County Airport Comprehensive Land Use Plan, Ells Field is able to have a single-family dwelling may be constructed on any existing lot in Zone B1, and multi-family units in Zone B1 shall not qualify as infill development as defined by Section 2.1.6. (Mendocino County Airport Land Use Commission, 1996). The Land Use Element does not have proposed infill or development within the area around the airport and proposed policy LU-10.5 Resource and Public Land Use Designations lists airports under Public - Service (P-S) which identifies the focused characteristics for the land associated with the Airport.

Military Operating Area

- The City of Willits and the Planning Area underly a Military Operating Area and state general plan law requires local governments to consider the impact of development on military readiness activities. Proposed policy LU-9.6 Military Operating Areas addresses this by requiring that notification be provided to the appropriate military departments for discretionary development projects that may have the potential to affect military special use airspace areas (Federal Aviation Administration (FAA), DOT, 2000).

Urban Forest Management Plan

- The City adopted an Urban Forest Management Plan on November 9, 2022, and the Land Use Element incorporates policies and programs to implement the recommendations of that plan through modifications to the Zoning Regulations in proposed policy LU-8.4 Protect Oak Trees and Woodlands.
- Proposed implementation measure LU-9A would create a Stream and Riparian Combining Zone. This would amend the Zoning Regulations to establish a Stream and Riparian Combining Zone with standards consistent with the Conservation and Open Space Element and the Land Use Element to protect streams, riparian areas, and wetlands from new ministerial and discretionary development. Amending the Zoning Map to apply the Stream and Riparian Combining Zone and notifying the public that specific standards apply for all development within such areas protects the urban forest landscape laid out in the Urban Forest Management Plan.
- Proposed implementation measure LU-9B Oak Tree Protections would further make the Land Use Element consistent with Urban Forest Management Plan, by adopting Zoning Standards to protect oak trees as part of new ministerial and discretionary development.

Willits Circulation Element

- The proposed policy LU-3.1, known as "Complete Streets," aligns with other sections of the Willits General Plan, such as the Plan Circulation Element Policies 2.230 and 2.260. These policies share the goal of improving accessibility for pedestrians and cyclists while reducing single-

occupancy vehicle trips. They emphasize that any efforts involving the design, construction, reconstruction, repair, and maintenance of the city's streets, bridges, pathways, and sidewalks should contribute to the creation of a fully integrated transportation network. This network should prioritize safety, accessibility, comfort, and inclusivity for people of all ages, backgrounds, incomes, and physical abilities, as well as all modes of transportation, especially pedestrians, cyclists, and transit users. The City is committed to applying a Complete Streets framework in relevant transportation projects to ensure the safe, convenient, and accessible use of streets for all users.

Willits Open Space and Conservation Element

- A requirement for Conservation and Open Space Mitigation 4.135 is review for all discretionary and ministerial applications is part of implementation and that a Riparian Area Land Use Overlay be established to prohibit new development within 30 feet from the top of bank on either side of the stream, to be implemented by the establishment of a new combining zone. These are addressed by proposed policies LU-9.1 Riparian Buffer Areas, LU-9.2 Not Net Loss of Wetlands Resulting from Development, and LU-9.3 Riparian Area Land Use Overlay.
- Proposed policy LU-8.2, Not Net Loss of Wetlands Resulting from Development, ensures that development activities do not lead to a net loss of wetlands, consistent with Conservation and Open Space Mitigation 4.736. This is achieved by determining the potential presence of wetlands near a proposed project during the evaluation of discretionary projects and ministerial building and grading permit applications, particularly when these activities involve new construction, expansion of existing structures, or grading work. If the characterization and boundaries of wetlands cannot be readily determined based on existing data or during a pre-site inspection, wetland delineation conducted by a qualified professional will be mandatory.
- Proposed implementation measure LU-8A would create a Stream and Riparian Combining Zone. The goal is to safeguard streams, riparian areas, and wetlands from both ministerial and discretionary development which aligns with the Conservation and Open Space Element.
- Proposed Policy LU-8B, Oak Tree Protections, is also consistent the Open Space and Conservation Element by adopting Zoning Standards to protect oak trees as part of new ministerial and discretionary development.

Willits Public Services and Facilities, Parks and Recreation Element

- Proposed policy LU-3.11, Parks and Recreation, is consistent with policies 6.230 and 6.350 of the Public Services and Facilities, Parks and Recreation Element. These policies aim to equitably expand opportunities for trails, parks, and recreational facilities throughout Willits and support the role of the City of Willits as a regional parks provider. It also considers evaluating the feasibility of establishing a recreation and parks district that extends beyond City boundaries to finance facilities that support the region that may be provided by the City.

As shown above, the goals, policies, and implementation measures of the Land Use Element were designed to be consistent with existing plans related to land use, especially those adopted for the purpose of avoiding or mitigating an environmental effect. Due to these efforts to make the Land Use Element cohesive with existing planning efforts, the implementation of the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the impact of the Land Use Element is expected to be less than significant.

MITIGATION MEASURE

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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3.12 Mineral Resources

This section evaluates the impacts to mineral resources within the Project Areas, which is comprised of the Proposed Sphere of Influence Area, the entire City of Willits, including the proposed Land Use Change Areas within the City.

Environmental Setting

Throughout its history, Mendocino County, including the vicinity of the Planning Area, has witnessed various mining activities. However, there are no known mineral resources within the City of Willits.

The most prevalent mineral resources in Mendocino County are aggregate resource minerals, primarily sand and gravel. Sand and gravel resources are commonly found along the region's rivers and streams. While historical records indicate the existence of prospects and claims within the Project Area for minerals such as Chromite, Magnesite, and Uvarovite, there are no active mineral mines located in the Project Area (USGS, 2023; U.S. Department of Labor's Mine Safety and Health Administration, 2023). There are several historical records for rock quarries but the closest currently active quarry to the Planning Area is Harris Quarry south of the Planning Area (Mendocino County, 2019).

Although no mineral extraction occurs anywhere within the Planning Area, there are two aggregate processors: Northern Aggregates and Nor-Cal Recycled Rock and Aggregate. Northern Aggregates is located on Cropley Lane within the Proposed SOI and operates the Harris Quarry. Nor-Cal Recycled Rock and Aggregate operates on Shell Lane within the Willits City limits.

Regulatory Setting

Federal

There are no federal regulations pertaining to mineral resources that are applicable to this analysis.

State

California Surface Mining and Reclamation Act

Gravel mining operations within the state fall under the regulatory framework of the California Surface Mining and Reclamation Act (SMARA). The purpose of SMARA is to identify and protect areas containing significant mineral resources. In doing so, SMARA:

a) regulates surface mining operations to assure that adverse environmental effects are prevented or minimized,
b) requires reclamation of mined lands to a usable condition that is readily adaptable to alternative land uses,
c) produces and conserves minerals, and considers values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment; and
d) eliminates residual hazards to the public health and safety.

Compliance with SMARA is mandatory throughout all stages of a mining project, including the reclamation process, to ensure adherence to the Act's provisions. The California State Mining and Geology Board has the responsibility to inventory and classify mineral resources and can designate such mineral resources as having a “statewide or regional significance.” If this is done, the local agency must adopt a management plan for such identified resources. Such areas have not been identified in Mendocino County at this time and have not been mapped by the state (Mendocino County, 2008).

Regional and Local

Mendocino County Code

Chapter 22.16 of the County Code is the Surface Mining and Reclamation Code (Mendocino County Code, Title 22, Land Usage). Section 22.16.030 states that the provisions of SMARA, Public Resources Code Section 2207, and the California Code of Regulations implementing the act are made a part of the code by reference.

Section 22.16.140 of the same section gives requirements for annual inspections and reports regarding surface mining and reclamation, and Section 22.16.200 provides enforcement for lack of compliance with the County's standards during inspections.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, impacts related to mineral resources from implementation of the project would be significant if it would:

1. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
2. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Mineral resource impact assessments involved a review of data available through analysis of SMARA documents, CEQA permits, and USGS records.

PROJECT IMPACTS AND MITIGATION

Threshold Min-01: Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Impact MIN-01: No impact

There are no known or identified mineral resource sites anywhere within the Planning Area or sites utilized for mineral extraction and the General Plan Conservation and Open Space or Land Use Element does not include policies or programs related to alteration of any natural material extraction. The scope of mineral resources associated with the project would be limited to those involved in the construction and landscaping activities required for the any proposed new development, park development, or infrastructure enhancement. The development of homes or commercial uses, enhancement of infrastructure, or park landscaping within the City is not expected to have a significant adverse impact on State resources or reserves. Therefore, no impacts to known mineral resources are anticipated to occur due to the proposed project.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Threshold Min-02: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Impact MIN-02: No impact

There are no sites within the City of Willits or Proposed SOI Area utilized for rock or sand extraction or that are identified by the City or the County's General Plans. Neither the Land Use Element, nor the General Plan's Conservation and Open Space Element include policies or programs related to mineral extraction or resource protection within the Project Area. The scope of mineral resources associated with the project would be limited to those involved in the construction and landscaping activities required for the any proposed new development. The development of homes or commercial uses, enhancement of infrastructure, or park landscaping within the City is not expected to have a significant adverse impact on the local mineral resources or reserves. Therefore, there would be no loss of availability of a locally important mineral resource recovery site due to the proposed project.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

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3.13 NOISE

This section summarizes the existing noise conditions of the region, agencies and regulations related to noise in the region and analyzes potential impacts that may directly or indirectly result from the proposed Project.

ENVIRONMENTAL SETTING

OVERVIEW OF NOISE AND VIBRATION

Noise

Noise is a subjective reaction to different types of sounds. Noise is typically defined as (airborne) sound that is loud, unpleasant, unexpected, or undesired, and may therefore be classified as a more specific group of sounds. Excessive and chronic exposure to elevated noise levels can result in auditory and nonauditory effects in humans. Auditory effects of noise on people are those relating to temporary or permanent hearing loss induced by noise. Nonauditory effects of exposure to elevated noise levels are those relating to behavioral and physiological effects. The nonauditory behavioral effects of noise on humans are associated primarily with the subjective effects of annoyance, nuisance, and dissatisfaction, which lead to interference with such activities as communications, sleep, and learning (Caltrans 2013).

The degree to which noise results in annoyance and interference with activities is highly subjective and may be influenced by non-acoustic factors. The number and effect of these non-acoustic environmental and physical factors vary, depending on the individual characteristics of the noise environment, including sensitivity, level of activity, location, time of day, and length of exposure. One key aspect to the prediction of human response to new noise environments is the individual level of adaptation to an existing noise environment. The greater the noise level change caused by a new noise source relative to an individual's customary environment, the less tolerant of the new noise source the individual will be. With regard to human perception of increases in sound levels expressed in decibels (dB). Within the usual range of environmental noise levels, perception of loudness is relatively predictable, and can be approximated by A-weighted sound levels. There is a strong correlation between A-weighted sound levels (expressed as dBA) and the way the human ear perceives sound.

The decibel scale is logarithmic, not linear. In other words, two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic decibel is A-weighted, an increase of 10 dBA is generally perceived as a doubling in loudness. A 1 dB change generally is not perceivable, excluding controlled conditions and pure tones. Outside controlled laboratory conditions, the average human ear barely perceives a change of 3 dB, a 5 dB change generally fosters a noticeable change in human response, and an increase of 10 dB is subjectively heard as a doubling of loudness. For example, a 70 dBA sound is half as loud as an 80 dBA sound and twice as loud as a 60 dBA sound (FTA 2006).

Noise exposures within industrial and commercial facilities are controlled by federal and state employee health and safety regulations administered by the Occupational Safety and Health Administration (OSHA) and the Division of Occupational Safety and Health (DOSH, better known as Cal/OSHA), respectively, but exterior noise levels are generally determined by locally adopted standards. In addition, noise generation from fixed noise sources may vary based upon climatic conditions, time of day and existing ambient noise levels.

Noise Descriptors

Community noise is commonly described in terms of the ambient noise level, defined as the all-encompassing noise level associated with a given environment. This is typically measured using the

average, or equivalent, sound level (Leq). The day/night average level (Ldn) is based upon the average noise level over a 24-hour day, with a +10-decibel weighing applied to noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours when people would most typically react stronger to noise exposures. CNEL is similar to Ldn but includes a +3 dB penalty for evening noise. An important way of predicting a human reaction to a new noise environment is the way it compares to the ambient noise level. In general, the more a new noise exceeds the previously existing ambient noise level, the less acceptable the new noise will be judged by those hearing it.

Typical Construction Noise Levels

Table 3.13a, below, presents the noise levels associated with typical construction equipment that would most likely be used in the development of future projects in the Planning Area.

Table 3.13a Typical Noise Levels of Common Construction Equipment

Equipment	**Reference Noise Level at 50 Feet (Lmax) A**	**Percent Usage Factor B**	**Predicted Noise Levels (Leq) at Distance (feet) C**					
			50	**100**	**200**	**300**	**400**	**500**
Auger Drill Rig	85	0.2	78	72	66	62	60	58
Backhoe	80	0.4	76	70	64	60	58	56
Boring Jack Power Unit	80	0.5	77	71	65	61	59	57
Bulldozer	85	0.4	81	75	69	65	63	61
Compact roller	80	0.2	73	67	61	57	55	53
Compressor	80	0.4	76	70	64	60	58	56
Concrete Mixer	85	0.4	81	75	69	65	63	61
Crane	85	0.16	77	71	65	61	59	57
Delivery Truck	84	0.4	80	74	68	64	62	60
Excavator	85	0.4	81	75	69	65	63	61
Front End Loader	80	0.4	76	70	64	60	58	56
Generator	82	0.5	79	73	67	63	61	59
Horizontal Boring Hydraulic Jack	80	0.25	74	68	62	58	56	54
Impact Pile Driver (low)	95	0.2	88	82	76	72	70	68
Impact Pile Driver (high)	101	0.2	94	88	82	78	76	74
Man Lift	85	0.2	78	72	66	62	60	58
Paver	85	0.5	82	76	70	66	64	62
Pneumatic tools	85	0.5	82	76	70	66	64	62
Pumps	77	0.5	74	68	62	58	56	54
Roller	85	0.2	78	72	66	62	60	58
Scraper	85	0.4	81	75	69	65	63	61
Tractor	84	0.4	80	74	68	64	62	60
Vacuum Truck	85	0.4	81	75	69	65	63	61

Notes:
A. Lmax noise levels based on manufacturer's specifications.
B. Usage factor refers to the amount of time the equipment produces noise over the time period.
C. Estimate does not account for any atmospheric or ground attenuation factors. Calculated noise levels based on Caltrans, 2009: Leq (hourly) = Lmax at 50 feet – 20log (D/50) + 10log (UF), where: Lmax = reference Lmax from manufacturer or other source; D = distance of interest; UF = usage fraction or fraction of time period of interest equipment is in use.

Sources: Caltrans 2013 and FHWA 2010.

Groundborne Vibration

Vibration is similar to noise in that it involves a source, a transmission path, and a receiver. While vibration is related to noise, it differs in that in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface (Town of Tiburon 2023).

Vibration is typically measured in terms of peak particle velocities (PPV) in inches per second (in/sec). Human and structural response to different vibration levels is influenced by several factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. Table 3.13b indicates that the threshold for damage to structures ranges from 0.2 to 0.6 in/sec PPV (Caltrans 2002).

Table 3.13b Effects of PPV on Humans and Structures

PPV (in/sec)	Human Reaction	Effect on Buildings
0.006-0.019	Threshold of perception; possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08	Vibrations readily perceptible	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected
0.1	Level at which continuous vibrations begin to annoy people	Virtually no risk of "architectural" damage to normal buildings
0.2	Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subjected to relative short periods of vibrations)	Threshold at which there is a risk of "architectural" damage to normal dwelling - houses with plastered walls and ceilings. Special types of finish such as lining of walls, flexible ceiling treatment, etc., would minimize "architectural" damage
0.4-0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic but would cause "architectural" damage and possibly minor structural damage.

Source: Caltrans 2002.

Vibration caused by construction activities is generally understood in accordance with guidance provided by the California Department of Transportation (Caltrans) in the Transportation and Construction

Vibration Guidance Manual dated April 2020. Transient sources create a single, isolated vibration event, such as through use of impact pile drivers, blasting, of drop-balls, for example. Continuous sources of vibration include use of excavation equipment, tracked vehicles, traffic on a highway, or vibratory pile drivers, for example. Construction activities may generate perceptible vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams, pile drivers) are used.

Table 3.13c presents typical vibration levels that could be expected from construction equipment at a distance of 25 to 100 feet. Caltrans (2002) uses a vibration limit of 0.5 in/sec, PPV for buildings structurally sound and designed to modern engineering standards. The highest levels of vibration typically occur from pile driving operations. Pile driving vibrations are typically below 0.5 in/sec, PPV at distances of 50 feet or more.

Table 3.13c Typical Vibration Levels of Common Construction Equipment (25 to 100 feet)

Type of Equipment	**PPV (in/sec)**			
	25 feet	**50 feet**	**75 feet**	**100 feet**
Pile Drive (Impact)	0.644	0.226	0.124	0.08
Pile Drive (Sonic)	0.17	0.06	0.033	0.021
Large Bulldozer	0.089	0.031	0.017	0.011
Loaded Trucks	0.076	0.027	0.015	0.01
Small Bulldozer	0.003	0.001	0	0
Auger/Drill Rigs	0.089	0.031	0.017	0.011
Jackhammer	0.035	0.012	0.006	0.004
Vibratory Hammer	0.07	0.025	0.0135	0.009
Vibratory Compactor/Roller	0.21	0.074	0.04	0.026

Source: FTA 2006.

Construction equipment typically generates vibration that spreads through the ground and diminishes with distance from the source. The effect on sensitive buildings in the vicinity of a construction site varies depending on soil type, ground strata, and the type of construction equipment used. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures, but can achieve the audible and perceptible ranges in buildings close to a construction site. See Table 3.13c, above, which lists typical vibration levels for construction equipment in PPV and velocity decibels (VdB). Table 3.13d provides guidelines for vibration damage potential to existing structures based on both transient and continuous sources, while Table 3.1c provides guidelines for vibration annoyance potential criteria and the typical human response.

Table 3.13d: Groundborne Vibration Exposure Standards

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic building, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and older residential structures with plaster walls and ceilings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern commercial and industrial buildings	2.0	0.5

Source: Caltrans 2020.

Table 3.13c: Groundborne Vibration Annoyance Potential Criteria

Human Response	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.1
Severe	2.0	0.4

Source: Caltrans 2020.

NOISE ENVIRONMENT OF THE PLANNING AREA

According to the Vision 2020 Willits General Plan Revision (General Plan), adopted on August 12, 1992, although Willits is generally a quiet community, its role as a subregional commercial and industrial center results in noise levels that are somewhat higher than those found in similar sized cities with lower levels of industry and commerce. As discussed in Chapter 3.0 - Project Description, the Land Use Change Areas are located within the city limits and are largely developed and/or surrounded by development, while portions of the Sphere of Influence (SOI) Area are developed with residential, commercial, and industrial development. As such, the existing noise environment varies throughout the Planning Area. Noise sources within the Planning Area that may affect portions of the Land Use Change Areas and SOI Area include several noise sources such as State Route 20, U.S. Highway 101, regular vehicle traffic, the Skunk Train, aircraft utilizing Ells Field, and fixed noise sources including industrial land uses. These noise sources are briefly elaborated upon below.

Vehicle Traffic

Significant noise sources in Willits include traffic on major roadways and highways. U.S. Highway 101 (Highway 101), State Route 20 (SR 20), and Main Street are the primary roadways that contribute to ambient noise. Sources of vibration in Willits may also arise from vehicular traffic. Like vehicle noise, vehicular vibration can affect receivers along roadways, depending on pavement, and the type and

weight of the vehicle. The Willits Main Street extends from the northern off-ramp of Highway 101 southward through town for approximately 1.75 miles before becoming an extension of SR 20, which connects to the southern on-ramp to Highway 101. SR 20 extends west to east from the junction of SR 1 and SR 20, south of Fort Bragg to Willits Main Street and then heads south as described to Highway 101. As of 2016, Highway 101 was rerouted across the Willits Bypass around the eastern side of the City. The majority of large commercial vehicular noise and vibration are directed onto SR 20 and Highway 101 on the bypass route, reducing the ambient noise and vibrations associated with these types of vehicles within Willits.

Railroad

The Skunk Train operates on the railroad lines previously belonging to the California Western Railroad that are now owned and operated by the Mendocino Railway. In operation since 1885, the Skunk Train runs through the redwood forest to provide passenger travel from depots in Willits and Fort Bragg, California. The Willits Depot, added to the National Register of Historic Places (NRHP) on October 20,1999 (with restaurant building and its connecting covered breezeway) is located at 299 E. Commercial Street and is where passengers are able to board and disembark from the train (National Archives 2023). The Skunk Train previously operated a route from Willits to Fort Bragg; however, due to a tunnel collapse along the route, the train now operates routes out of Willits and Fort Bragg to intermediate stops.

Aircraft

Ells Field, also known as Willits Municipal Airport, is owned and operated by, and within the City and maintains a Federal Aviation Administration (FAA) location identifier (LID) of O28. The approximately 75-acre airport is located in the community of Brooktrails at 1320 Poppy Drive on the mountain plateau three miles north of Willits. The runways, named Runway 16 and Runway 34, are 3,000 feet long by 75 feet wide with an improved asphalt surface. Annual aircraft operations at Ells Field average about 13,000 landing and/or takeoffs a year. Primary takeoff is downslope with primary landing being upslope (MCACLUP 1996).

Fixed Noise Sources

Within the Planning Area, fixed noise sources typically include parking lots, loading docks, parks, schools, commercial timber/wood processing, and other residential/commercial/retail use noise sources such as HVAC, exhaust fans, etc. Industrial uses that may generate noise include uses such as but not limited to sawmills and wood products factories, log storage and processing yards, wholesaling and storage facilities, heavy equipment operators, manufacturing facilities, and machine shops.

Sensitive Receptors

Sensitive receptors are generally considered to be people that have an increased sensitivity to noise or vibration impacts, or places where such people may normally be found. These may include, but are not limited to, preschools and daycare centers, K-12 schools, nursing homes, hospitals, residential uses, and parks and recreational areas. Vibration-sensitive receptors may also include historical buildings. Potential sensitive receptors within the Planning Area that may be affected by the Project would include residential uses, schools, and churches.

REGULATORY SETTING

FEDERAL

U.S. Department of Transportation

The U.S. Department of Transportation (USDOT) is a federal department responsible for maintaining and developing the nation's transportation network and associated infrastructure. The FAA, Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), and Federal Transit Administration (FTA) address specific areas of the transportation network (aviation, highway, railroad, and transit, respectively) and have regulatory authority related to noise impacts.

The FAA has prepared guidelines for acceptable noise exposure in its Federal Aviation Regulations Part 150. The Noise Compatibility Planning program for airports began in 1981 under the Aviation Safety and Noise Abatement Act of 1979. The program aims to balance the operational needs of airports while also considering impacts on surrounding communities. The purpose of the program is to reduce noise impacts on existing incompatible land uses and prevent the introduction of new incompatible land uses in areas impacted by aircraft noise. The program establishes standard noise methodologies and metrics, identifies land uses normally compatible with various levels of airport noise, and provides for voluntary development and submission of noise exposure maps and noise compatibility programs by airport operators.

Through regulations in 23 CFR Part 772, the FHWA, FRA, and FTA have established recommendations to conduct thorough noise and vibration assessments for highway, high-speed railroad, or mass transit project that would be constructed proximate to residential areas. These recommendations apply to projects that are federally funded or that require federal review.

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (EPA) has identified the relationship between noise levels and human response. The EPA has determined that over a 24-hour period, an Leq of 70 dBA will result in some hearing loss. Interference with activity and annoyance will not occur if exterior levels are maintained at an Leq of 55 dBA and interior levels at or below 45 dBA. Although these levels are relevant for planning and design and useful for informational purposes, they are not land use planning criteria because they do not consider economic cost, technical feasibility, or the needs of the community.

The EPA has set 55 dBA Ldn as the basic goal for residential environments. However, other federal agencies, in consideration of their own program requirements and goals as well as the difficulty of actually achieving a goal of 55 dBA Ldn, have generally agreed on the 65 dBA Ldn level as being appropriate for residential uses. At 65 dBA Ldn, activity interference is kept to a minimum, and annoyance levels are still low. It is also a level that can realistically be achieved.

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) was established in response to the Urban Development Act of 1965 (Public Law 90-448). HUD was tasked by the Housing and Urban Development Act of 1965 (Public Law 89-117) "to determine feasible methods of reducing the economic loss and hardships suffered by homeowners as a result of the depreciation in the value of their properties following the construction of airports in the vicinity of their homes."

HUD first issued formal requirements related specifically to noise in 1971 (HUD Circular 1390.2). These requirements contained standards for exterior noise levels along with policies for approving HUD-

supported or assisted housing projects in high noise areas. In general, these requirements established the following three zones:

- 65 dBA Ldn or less - an acceptable zone where all projects could be approved.
- Exceeding 65 dBA Ldn but not exceeding 75 dBA Ldn - a normally unacceptable zone where mitigation measures would be required, and each project would have to be individually evaluated for approval or denial. These measures must provide 5 dBA of attenuation above the attenuation provided by standard construction required in a 65 to 70 dBA Ldn area and 10 dBA of attenuation in a 70 to 75 dBA Ldn area.
- Exceeding 75 dBA Ldn – an unacceptable zone in which projects would not, as a rule, be approved.

HUD's regulations do not include interior noise standards. Rather, a goal of 45 dBA Ldn is set forth and attenuation requirements are geared towards achieving that goal. HUD assumes that using standard construction techniques would provide sufficient attenuation so that if the exterior level is 65 dBA Ldn or less, the interior level will be 45 dBA Ldn or less. Thus, structural attenuation is assumed at 20 dBA. However, HUD regulations were promulgated solely for residential development requiring government funding and are not related to the operation of schools or churches.

STATE

California Noise Land Use Compatibility Matrix

The State Department of Health Services, Office of Noise Control establishes compatibility of land uses relative to existing and future ambient noise levels. Appendix D of the State of California General Plan Guidelines 2017, prepared by the Governor's Office of Planning and Research, identifies noise level acceptability for each land use type from 'normally acceptable', to 'clearly unacceptable'.

California Government Code Section 65302(f)

California Government Code Section 65302(f) requires that all General Plans include a Noise Element to address noise problems in the community. The State Office of Planning and Research (OPR) has established guidelines for the content of the Noise Element of the General Plan. A Noise Element shall identify and appraise noise problems in the community. The Noise Element shall recognize the guidelines established by the Office of Noise Control and shall analyze and quantify to the extent practicable current and projected noise levels for all the following sources:

- Highways and freeways.
- Primary arterials and major local streets.
- Passenger and freight on-line railroad operations and ground rapid transit systems.
- Commercial, general aviation, heliport, and military airport operations, aircraft flyovers, jet engine test stands, and all other ground facilities and maintenance functions related to airport operation.
- Local industrial plants, including, but not limited to, railroad classification yards.
- Other stationary ground noise sources identified by local agencies as contributing to the community noise environment.

State of California Code of Regulations

The State's noise insulation standards are codified in the California Code of Regulations (CCR), Title 24, Building Standards Administrative Code, Part 2, California Building Standards Code (CBSC). These noise standards are applied to new construction in California for interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive

structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

REGIONAL AND LOCAL

Vision 2020 Willits General Plan Revision (1992)

The Noise Element of the General Plan (1992) establishes the following goals and policies, as well as criteria for evaluating the compatibility of individual land uses with respect to noise exposure:

4.100 Noise Goal:

To preserve the existing community noise environment, while minimizing the exposure of Willits residents to potentially harmful noise levels.

4.200 Noise Policies:

4.210 The City seeks to maintain ambient noise levels of 55 dBA (CNEL) in existing residential areas.

4.220 For residential development in areas with existing ambient noise levels in excess of 60 dBA, noise attenuation shall be required to reduce average indoor noise levels to a maximum of 45 dBA.

4.230 All noise sensitive land uses in areas with ambient noise levels in excess of 60 dBA shall require acceptable mitigation of noise impacts as a condition of approval.

4.240 Application processing procedures may require the submittal of appropriate acoustical data so that the noise impacts of proposed uses can be properly evaluated and mitigated.

4.250 Noise from all sources should be maintained at levels that will not adversely affect adjacent properties or the community, especially during the evening and early morning hours.

4.260 Noise created by temporary activities necessary to provide construction or required services should be permitted for the shortest duration possible and limited to time periods that will have the least possible adverse effect on surrounding land uses.

4.270 Uses should be located where they will be most acoustically compatible with elements of the man-made and natural environment.

4.280 On completion of the U.S. 101 bypass, load limits shall be established along Main Street north of State Route 20 to prevent large trucks from traversing this portion of the roadway.

4.300 Noise Implementation Measures:

4.310 Through the application review process, orient sensitive portions of buildings away from noise sources and encourage utilization of design techniques that will reduce adverse noise impacts.

4.320 Utilize natural terrain to screen structures from major arterials or other noise sources.

4.330 Monitor known noise problems and evaluate complaints regarding new noise sources in order to develop the most practical solutions.

4.340 Should complaints regarding undesirable noise levels increase significantly, the City shall consider an ordinance providing for the control of excessive noise-generating activities.

4.350 Continue to monitor airport noise levels and seek to minimize noise increases, both in Willits and within unincorporated residential areas in the vicinity of the airport.

4.360 Encourage the use of landscaping and vegetation as noise buffers.

4.300 Noise Mitigation Measures

4.430 Mitigation Measures. In situations where the range of noise levels is higher than that considered normally acceptable for a specified land use type, it may be possible to reduce the effective noise level to achieve better compatibility. Each site has its own characteristics and problems, thus mitigation measures which are effective for one project may not apply to another. For this reason, it is not appropriate to predetermine the method by which noise levels should be reduced or controlled throughout the community. Regardless of the mitigation measure or combination of measures which is used, it is almost always less costly to include the mitigation in the design phase rather than dealing with the problem later.

The measure or combinations of measures that can be used to mitigate noise fall into four general categories:

1. Site Planning

2. Architectural Treatment

3. Noise Barriers

4. Construction Modification

Site Planning. By taking advantage of the natural shape and contour of sites it is often possible to orient buildings and other uses in a way that will reduce or eliminate noise impact. Cluster development is conducive to noise reduction. The ways in which site planning can be used to reduce noise impacts are as follows:

Increase the distance between the noise source and the receiver.

Place non-noise-sensitive land uses (parking lots, maintenance

facilities, utility areas) between the source and the receiver.

Use non-noise-sensitive structures (garages) to shield noise sensitive areas.

Orient buildings so outdoor areas are shielded from noise.

Architectural Layout. By attention to the types of uses being accommodated in a structure, the noise-sensitive uses can be moved to the quiet side of the building. Some typical examples are listed:

Put bedrooms on the side of the house farthest from roadways.

Do not locate outdoor balconies facing major roadways.

Design U-shaped buildings to shield patios.

Noise Barriers. Solid barriers between the noise source and the noise sensitive area block out sound waves. The minimum acceptable surface weight for an effective noise barrier is 4 pounds per

square foot (equivalent to 3/4 inch plywood) with no cracks or openings. To be effective the barrier must interrupt the line of sight between the noise source and the receiver. Noise barriers are created by topographical features in some situations. Earth berms can be created by grading to achieve the same result. It should be noted that short barriers are not effective regardless of height because sound waves will pass around the end of them and still .reach the receiver. This effect, called flanking, can be minimized by bending the wall or barrier back from the noise source at the ends of the barrier.

Construction Modification. Indoor noise levels due to exterior noise sources can be controlled by the noise reduction characteristics of the building's shell. In general, windows and doors are the weakest links in the acoustic skin of a building. The amount of insulation and sealing required depends on the amount of noise reduction required. The following approaches may be considered:

Use solid core doors having an acoustic door gasket.

Use double paned glass or gasketed window systems.

Add insulation. material to walls, ceilings and floors.

Specific mitigation measures designed to address the noise impacts of the Willits General Plan Revision are listed below.

4.431 Require site-specific noise assessment by a qualified acoustical consultant and acceptable mitigation of estimated noise impacts for all commercial and industrial development proposed in proximity to noise sensitive land uses.

4.432 In the interim period prior to the completion of the U.S. 101 bypass, interior noise levels should be measured at Willits High School and Howard Memorial Hospital. If the average interior noise level at either of these locations is found to be in excess of 45 dBA, appropriate noise attenuation techniques should be implemented.

4.433 On completion of the U.S. 101 bypass, load limits shall be established on Main Street between State Route 20 and Commercial Street to reduce truck traffic on this portion of the roadway.

4.434 In the event that complaints about noise increase in the future, the City shall consider adoption of a noise control ordinance.

City of Willits Municipal Code

The City of Willits Municipal Code contains limited regulations pertaining to noise and vibration. These are found in Title 17, Chapter 17.50 – Performance Standards, which apply to all uses of property.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS

Generally, a project may have a significant effect on the environment if it would substantially increase the ambient noise levels for adjoining areas or expose people to severe noise levels. In practice, more specific professional standards have been developed. These standards state that a noise impact may be considered significant if it would generate noise that would conflict with local project criteria or ordinances, or substantially increase noise levels at noise sensitive land uses. The City has not established significance thresholds regarding noise and vibration impacts. Therefore, consistent with

Appendix G of the CEQA Guidelines, the Project would have a significant impact related to noise if it would:

a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
b. Generate excessive groundborne vibration or groundborne noise levels.
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

METHODOLOGY

Potential noise and vibration impacts are analyzed based on the potential for the Project to generate noise and vibration beyond the thresholds listed above during construction and operation of potential development facilitated by the Project.

PROJECT IMPACTS AND MITIGATION

Impact NOI-01 and 02: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies and/or excessive groundborne vibration or groundborne noise levels?

As discussed above, the Planning Area is partially developed with uses that contribute to the existing noise environment. The Project may facilitate new development that would contribute to noise and groundborne vibration levels and/or be affected by the existing noise environment, depending on its location and land use. Such development would be anticipated to involve construction resulting in temporary noise and groundborne vibration generation from the use of typical construction equipment and a long-term increase in the ambient noise levels due to an increase in development. Potential commercial and industrial land uses may additionally lead to a long-term increase in vibration levels.

Since individual project-specific information is not available at this time, potential short-term (construction related) noise and groundborne vibration impacts were qualitatively evaluated based on typical construction activities associated with development. Potential construction source noise and groundborne vibration levels can be understood based on methodologies, reference noise levels, typical equipment usage, and other operating factors documented and contained in the FHWA Construction Noise Handbook (2006), FTA Transit Noise and Vibration Impact Assessment document (2018), and Caltrans' Transportation Construction Vibration Guidance Manual (2013). Reference levels are noise and vibration emissions for specific equipment or activity types that are well documented and for which their usage is common practice in the field of acoustics. Typical noise and vibration levels of construction equipment are provided in Tables 4.13-1 and 4.13-3, respectively.

Common construction activities that may be associated with future development projects could include: staging, demolition, site preparation, grading, utility trenching, foundation work, material deliveries (requiring travel along City roads and nearby highways), building construction, paving, coating application, and site finishing work. In general, these activities would involve the use of worker vehicles, delivery trucks, dump trucks, and heavy-duty construction equipment including but not limited to backhoes, tractors, loaders, graders, excavators, rollers, cranes, material lifts, generators, and air

compressors. These types of construction activities would be anticipated to generate noise and vibration from the following sources:

- Heavy equipment operations at different work areas. Some heavy equipment would consist of mobile equipment, such as a loader and excavator, that would move around work areas; other equipment would consist of stationary equipment (e.g., cranes or material hoists/lifts) that would generally operate in a fixed location until work activities are complete. Heavy equipment generates noise from engine operation, mechanical systems, and components (e.g., fans, gears, propulsion of wheels or tracks), and other sources, such as back-up alarms. Mobile equipment generally operates at different loads, or power outputs, and produces higher or lower noise levels depending on the operating load. Stationary equipment generally operates at a steady power output that produces a constant noise level.
- Vehicle trips, including worker, vendor, and haul truck trips.

Construction noise impacts generally occur when construction activities take place in the vicinity of noise sensitive land uses, during noise sensitive times of the day (generally prior to 7:00a.m. and after 10:00p.m.), or when construction durations last for extended periods of time. Demolition, site preparation, and grading phases typically result in the highest temporary noise levels due to the use of heavy-duty equipment such as bulldozers, excavators, graders, loaders, scrapers, and trucks. Vibration impacts would be anticipated to be of shorter duration and dependent on the specific equipment utilized. For example, pile drivers are typically used for short periods of time but generate groundborne vibration that would be felt at different levels when utilized (see Table 3.13-3). As with noise, groundborne vibrations and groundborne noise levels would spread through the ground and diminish with distance from the source. The effect on sensitive receptors and buildings in the vicinity of the vibration source would vary depending on soil type, ground strata, and construction of the building. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels.

The magnitude of each potential future project's increase in ambient noise and vibration levels would be dependent upon a number of site and project-specific factors that are not known at this time, including: the amount and type of equipment being used; the distance between the area where equipment is being operated and the location of the specific land use or receptor where noise and vibration levels are being evaluated; the time of day construction activities are occurring; the presence or absence of walls, buildings, or other barriers that may absorb or reflect sound waves; the presence of buildings that may enhance the intensity of vibration; the total duration of the construction activities; and the existing ambient noise and vibration levels near construction areas. It is anticipated that smaller infill sites within the Land Use Change Areas would be subject to elevated ambient noise and vibration levels. Development of this land would have the potential to cause the greatest impact on sensitive receptors, if not properly managed, due to the developed nature of the City; however, it is not anticipated that this development would significantly affect ambient noise or vibration levels. In contrast, portions of the SOI Area are removed from the concentrated development of the City and would most likely be subject to lower ambient noise and vibration levels and few sensitive receptors. Development of this land is not anticipated to have a significant effect on sensitive receptors but may lead to a greater increase in the ambient noise levels, if noise-generated uses are developed in sparsely developed areas.

Although the Project may facilitate development that could increase noise and vibration levels in the Planning Area, it is not anticipated that these would be in excess of existing uses within the Planning Area nor City standards, as the City would evaluate each development project for compliance with the

General Plan (1992), Municipal Code, and applicable regulations and for discretionary project, complete site-specific CEQA analysis, where applicable. No new land uses are proposed under the Project that are atypical and incompatible with existing land uses within the City. Potential new uses would be consistent with existing land use and development patterns. Construction and operation of future potential development projects would therefore be assumed to generate noise and vibration levels consistent with existing uses. Additionally, as specified above, the General Plan (1992) contains a Noise Element with policies geared towards maintaining acceptable noise levels, as determined by the City. Additionally, Title 17, Chapter 17.50 of the Municipal Code provides performance standard regulations that specify noise limits, distances for measurement of noise and vibration levels, and parameters for understanding the type, location, and character of noise and vibration sources. As future development facilitated by the Project would be evaluated by the City for conformance with existing policies and regulations, the Project would not cause the generation of a substantial temporary or permanent increase in ambient noise levels in the Planning Area in excess of established standards. The impact would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Impact NOI-03: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

As previously discussed, Ells Field, also known as the Willits Municipal Airport (FAA LID: O28), is within an incorporated island of the City and located approximately 1.75 miles north of the core City of Willits incorporated area. Ells Field is the only airport in the Planning Area and is owned and operated by the City, and within the City. As shown on Ells Field Compatibility Map (County of Mendocino 1996, Appendix E), the compatibility zones do not extend much beyond the runway and would not affect nearby noise-sensitive receptors. Additionally, the Land Use Change Areas and SOI Areas are not located near the airport or affected by noise compatibility areas.

Because the Project would not introduce new uses near the Ells Field airport and future development would be required to adhere to Noise Policies 4.210, 4.220, and 4.230 and Noise Implementation Measure 4.350 (listed above) related to compatibility with the continued use of Ells Field, impacts from future potential projects in the Planning Area would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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Acronyms/Abbreviations

CBSC	California Building Standards Code
CCR	California Code of Regulations
Caltrans	California Department of Transportation
CEQA	California Environmental Quality Act
Cal/OSHA	California Division of Occupational Safety and Health
CNEL	Community Noise Equivalent Level
DNL / Ldn	Day-Night Noise Level
dB	Decibel (unweighted)
dBA	Decibels, A-Weighted
D	Distance
FAA	Federal Aviation Administration
FHWA	Federal Highway Works Administration
FICON	Federal Interagency Committee on Noise
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
HVAC	Heating, Ventilation, and Air Conditioning
Hz	Hertz
In/sec	Inches per Second
kH	Kilohertz
Leq	Average / Equivalent Noise Level
Lmax	Maximum Noise Level

Lmin	Minimum Noise Level
LT	Long-term
OITC	Outside-Indoor Transmission Class
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pa	Pascals
PPV	Peak Particle Velocity (inches/second)
SR	State Route
ST	Short-term
STC	Sound Transmission Class
TIA	Transportation Impact Analysis
TNM	Traffic Noise Model
HUD	U.S. Department of Housing and Urban Development
EPA	U.S. Environmental Protection Agency
UF	Usage Factor
VdB	Velocity Decibels
VMT	Vehicle Miles Travelled
§	Section
%	Percent

3.14 POPULATION AND HOUSING

This section summarizes existing and projected population and housing within City boundaries and analyzes the potential impacts on population and housing due to the project. This section incorporates information and analysis from the City's 2019 Housing Element Update, the 2019 Mendocino County Housing Element Update, and the 2018 Regional Housing Needs Plan for Mendocino Council of Governments (MCOG).

ENVIRONMENTAL SETTING

A. DEFINITIONS

City Population – City population refers to the total number of people living within the boundaries of a specific city or municipality. It represents the count of residents, both permanent and temporary, who call the city their place of residence. The city population is a key demographic indicator and is often used for various planning, resource allocation, and governance purposes, including determining the representation a city has in government, assessing infrastructure and service needs, and studying urban growth and development trends.

Housing Unit – A housing unit is a single, separate place of residence intended for occupancy by one household. It is typically a structure or part of a structure (like a house, apartment, mobile home, or condominium) where people live, sleep, and carry out their daily activities. Housing units can vary in size and type, from single-family homes to multi-family apartment buildings, and they may be owner-occupied or rented. Each housing unit provides a private, self-contained living space for one or more individuals or a single family.

Household – A household is defined by the Department of Finance (DOF) and the United States Bureau of the Census (US Census) as a group of people who occupy a housing unit. Small households, consisting of one to two persons per household, traditionally reside in units with zero to two bedrooms; family households of three to four persons normally reside in units with three to four bedrooms. Large households of five or more persons typically reside in units with four or more bedrooms. However, the number of units in relation to the household size may also reflect preference and economics. Many small households obtain larger units, and some large households live in small units for economic reasons.

Dwelling Unit – A household differs from a dwelling unit because the number of dwelling units includes both occupied and vacant dwelling units. Not all the population lives in households as a portion of the population lives in group quarters, such as board and care facilities, and others are unhoused.

Population Growth Rate – The population growth rate is a measure of how the size of a population changes over a specific period, usually expressed as a percentage. It is calculated by taking the difference between the population at the end and the beginning of the period, dividing it by the initial population, and then multiplying by 100. A positive growth rate indicates an increase in population, while a negative rate signifies a decrease.

Housing Growth Rate – The housing growth rate is a similar concept, but it specifically measures the change in the number of housing units within a given area over a defined time frame. It is also typically expressed as a percentage and calculated in a manner similar to the population growth rate, by comparing the number of housing units at the end and the beginning of the period, dividing by the initial number, and multiplying by 100. A positive housing growth rate implies an increase in the housing stock, while a negative rate indicates a decrease.

Vacancy Rate – A vacancy rate is a real estate and economic indicator that measures the percentage of vacant or unoccupied rental units within a specific housing market or geographic area, typically

expressed as a percentage. It is a crucial metric for assessing the health of a housing market and can be used for various purposes, including evaluating rental demand, determining rental property investment potential, and understanding the overall economic conditions of an area. A low vacancy rate indicates a tight or competitive rental market, where demand for rental units often exceeds supply. This can lead to higher rental prices and may benefit property owners and landlords. Conversely, a high vacancy rate suggests an oversupplied or sluggish market, where there are more available rental units than renters seeking them. In such cases, rental prices may be more competitive, and property owners may have difficulty finding tenants. As per the Willits 2019-2027 Housing Element Update, a vacancy rate of 5 percent is generally considered optimal because it is high enough to provide some flexibility in the housing market without significant increases in housing prices. Vacancy rates are influenced by factors like economic conditions, population growth, employment opportunities, and housing policies. Real estate professionals, investors, and policymakers often use vacancy rates to make informed decisions about property management, investment, and urban planning.

B. Population Trends and Projected Growth

Following the downturn of the predominant industry in the area which was timber, Willits has experienced minimal economic and population growth over the past two decades. As of March 2024, the estimated City population is 4,830 (State of California, Department of Finance, 2024). Between Census years 2000 and 2010, the city's population decreased from 5,073 to 4,888 which is 185 people and represents a change of minus 3.7 percent. The following Census period, between 2010 and 2020, Willits population increased from 4,888 to 4,947, reflecting a gain of 59 people, or a increase of 1.2 percent. The average annual growth rate during this period was approximately 0.13 percent, equivalent to about six additional residents per year. Since 2020, there was a brief increase in population by 0.02% in 2021 however, the year-to-year percent change since then has been negative. Population loss for the last two years has been -0.85% and -0.98% respectively, indicating the City is currently in a negative growth trend.

Table 3.14a: Willits Population Growth 1990 to 2023

Year	Population	% Change from Last Census	Year to Year % Change
1990	**5,027** [1]		
2000	***5,073*** [1]	***0.92%***	***0.09%***
2010	***4,888*** [1]	***-3.65%***	***-0.37%***
2011	4,870	-0.37%	-0.37%
2012	4,881	-0.14%	0.23%
2013	4,957	1.41%	1.56%
2014	4,965	1.58%	0.16%
2015	4,966	1.60%	0.02%
2016	5,025	2.80%	1.19%
2017	5,057	3.46%	0.64%
2018	5,133	5.01%	1.50%
2019	5,107	4.48%	-0.51%
2020	**4,948** [1]	***2.05%***	***2.05%***
2021	4,968	0.02%	0.02%
2022	4,889	-0.83%	-0.85%
2023	4,835	-1.80%	-0.98%

Year	Population	% Change from Last Census	Year to Year % Change
2024	4,830	-3.17%	-0.10%

Source: (US Census Bureau, 2023; State of California, Department of Finance, 2024)

1. Data from U.S. Decennial Census, the rest are from DOF estimates.

In contrast to other jurisdictions in Mendocino County, Willits was the sole incorporated city that experienced population growth from 2010 to 2020 although the unincorporated area and the County as a whole grew in population (State of California, Department of Finance, 2024). For the following period from 2020 to 2024, population growth trends reversed for Willits and the City experienced the second largest drop in population in the region after Point Arena. A detailed breakdown of regional population growth for Mendocino County as well as other local jurisdictions is shown in the table below.

Table 3.14b: Regional Population Growth in Mendocino County and Nearby Jurisdictions (2010-2020 and 2020-2023)

Jurisdiction/County	2010*-1/1/20	1/1/20-1/1/23
Fort Bragg	-2.73%	-0.94%
Point Arena	-1.13%	-1.14%
Ukiah	-0.14%	-0.77%
Willits	0.37%	-0.99%
Unincorporated	3.26%	-0.37%
Incorporated	-0.71%	-0.86%
County Total	***1.99%***	***-0.52%***

Source: (State of California, Department of Finance, 2024)
Note: 2010 Census benchmark used (4/1/2010) and population counts vary slightly based on the source of data and type of survey.

In July 2023 (revised March 2024), the Department of Finance published interim population projections that reflect the July 1, 2022, state and county population estimates published in December 2022 and that are informed by the U.S. Census Bureau's blended base because not all Census 2020 data were available. These projections suggest that the county-wide population will decline between 2023 and 2028 at an average annual rate of approximately minus 0.2 percent per year and then slowly grow back to approximately the County's 2020 population level in 2043, growing at an average annual rate of approximately 0.05 percent per year.

Table 3.14c: Census Bureau Population Estimates (2010,2020) and DOF Projections for Mendocino County (July 1, 2023 to 2030)

	Population	Avg Annual Change for Period	Total Pct Change from 2020
2020[2]	91,601		
2023[3]	89,164	-0.9%	-2.7%
2025	88,580	-0.3%	-3.3%
2030	88,789	0.0%	-3.1%
2035	89,132	0.1%	-2.7%
2040	89,200	0.0%	-2.6%
2043	89,139	0.0%	-2.7%
2045	89,235	0.1%	-2.6%
2050	89,697	0.1%	-2.1%

1. California Department of Finance. Demographic Research Unit. Report P-2A: Total Population Projections, California Counties, 2020-2060 (Baseline 2019 Population Projections; Vintage 2023 Release) March 2024.
2. Census 2020.
3. Department of Finance, Population Estimates Population and Housing Estimates for Cities, Counties, and the State, January 1, 2021-2023, with 2020 Benchmark.

C. Housing and Dwelling Units Trends

Willits currently has 2,160 housing units which is an increase of 87 housing units since 2010. Of these, 755 are owner-occupied (32.7%), 1,556 are renter-occupied (67.3%), and 128 are vacant (5.9%) (State of California, Department of Finance, 2024). This is compared to 2010 when there was a total of 1,914 occupied housing units, 843 of which were owner-occupied (41%) and 1,071 were renter-occupied (52%), with an additional 159 (7.7%) that were vacant. From 2010 to the present, there has been a noticeable trend towards an increase in renter-occupied housing and a corresponding minor decline in vacancy rates. As per the Willits 2019-2027 Housing Element Update, historical vacancy rates exhibited a steady rise starting in 2000, reaching their highest point in 2014. However, an abrupt and significant drop occurred in 2016, when the vacancy rate in Willits dipped to approximately 4.3%.

The most recent detailed data from the American Community Survey (ACS) has 5-year estimates for 2021. In 2021, a majority of occupied housing units were renter-occupied which represents a larger shift from 2016's existing trends. In 2016, there were almost twice as many single-person renter households (537) than single-person owner households (255) and there were roughly the same number of owner-occupied households with two to three occupants (473) as renter-occupied households with two to three occupants (439), although it constituted a larger percentage of total owner occupied housing units. By 2021, there were 283 more occupied housing units but 400 more units were renter occupied and owner occupied units had 117 less units. Large households consisting of four or more persons experienced the largest change in occupied housing units with a 65.2% loss (94 units) in owner-occupied housing and experienced very little change in renter-occupied housing with only 3.9% of additional housing units. A detailed breakdown of household size and tenure characteristics from 2016 to 2021 is shown in Table 3.14d below.

Table 3.14d: Willits Household ACS Size and Tenure Characteristics Estimates for 2016 and 2021

Tenure Category	Household Size	2016 Housing Unit	2016 Percentage of Tenure Category	2021 Housing Units	2021 Percentage of Total	2016-21 Percent Change
Owner-Occupied Dwelling Units	Householder living alone	255	29%	239	32%	*-6.3%*
	Household 2-3 persons	473	54%	466	62%	*-1.5%*
	Large households 4+ persons	144	17%	50	7%	*-65.2%*
	Total	***872***		***755***		
Renter-Occupied Dwelling Units	Householder living alone	537	47%	797	51%	*48.4%*
	Household 2-3 persons	439	38%	572	37%	*30.3%*
	Large households 4+ persons	180	16%	187	12%	*3.9%*
	Total	***1156***		***1556***		
All Occupied Dwelling Units	Householder living alone	*792*	*39%*	1036	45%	*30.8%*
	Household 2-3 persons	912	45%	1038	45%	*13.8%*
	Large households 4+ persons	324	16%	237	10%	*-26.9%*
	Total	***2028***		***2311***		
All Vacant Housing Units		92[1]	4%[1]	128	6%	*39.1%*

Source: (City of Willits, 2019; US Census Bureau, 2023; State of California, Department of Finance, 2024)

1. Data Willits 2019-2027 Housing Element, the rest are from Census Bureau and DOF estimates which varies from Housing Element numbers due to variation in sources for survey data.

Historical trends show a moderately stable build rate. Despite a population decline between Census 2000 and 2010, the total number of housing units in the City increased by 60 units which is a 3% change from 2,013 to 2,073 units. The average annual housing growth rate during this period was 0.29%. Between 2010 and 2020, housing units within the City further expanded from 2,073 to 2,147 units, an increase of 74 units, or a total change of 3.6%. The average annual housing growth rate during this period was 0.35 percent. Notably, from 2020 to 2023, the city added an additional 13 housing units, at an annual average rate of 0.27%, reflecting a total change of slightly over half a percent.

Table 3.14e: Willits Housing Growth 1990 to 2022

Year	Housing Units	% Change from Last Census	Year to Year % Change
1990	**1,968** [1]		
2000	***2,013*** [1]	***2.29%***	***0.23%***
2010	***2,073*** [1]	***2.98%***	***0.29%***
2011	2,078	0.24%	0.24%
2012	2,082	0.43%	0.19%
2013	2,087	0.68%	0.24%
2014	2,098	1.21%	0.53%
2015	2,105	1.54%	0.33%
2016	2,115	2.03%	0.48%
2017	2,126	2.56%	0.52%
2018	2,137	3.09%	0.52%
2019	2,142	3.33%	0.23%
2020	***2,147*** [1]	**3.57%**	***0.23%***
2021	2,152	0.23%	0.23%
2022	2,157	0.47%	0.23%
2023	2,160	0.61%	0.14%
2024	2,169	1.02%	0.42%

*Sou*rce: (US Census Bureau, 2023; State of California, Department of Finance, 2024)

1. Data from U.S. Decennial Census, the rest are from DOF estimates.

Distribution of housing unit type has remained fairly consistent in Willits, with over 50% of occupied housing units being single-family, detached homes for both 2016 and 2023. Only 4-5% of single-family homes are attached for the same time period. Multifamily units (any units comprising of more than 2 units) comprise 28% of the occupied housing stock for both years as well. A detailed breakdown of housing unit stock for the City in 2016 and 2023 is shown in the table below.

Table 3.14f: Willits Housing Stock ACS Estimates for 2016 and 2023

Housing Unit Type	2016 Housing Unit Estimates	2016 Percentage	2023 Housing Unit Estimates	2023 Percentage
Single-Family, Detached	1,134	54.2%	1,182	54.7%
Single-Family, Attached	93	4.4%	103	4.8%
Multifamily, 2–4 Units	307	14.7%	317	14.7%
Multifamily, 5+ Units	280	13.4%	287	13.3%
Mobile Homes or Other Type	277	13.3%	271	12.5%
Total	*2091*	*100%*	*2,160*	*100%*

Source: (State of California, Department of Finance, 2024; Department of Finance, 2021)

The age and distribution of age of the community's housing can be considered an indicator of overall housing conditions in the City. Houses older than thirty years old generally require rehabilitation such as new plumbing, roof repairs, foundation work, etc. Seeing as most of the current housing stock (67%)

was built before 1980, a majority of the Willits housing stock has a higher likelihood of needing rehabilitation and repair.

Table 3.14g: City of Willits ACS Age of Housing Stock for 2021

Year Built	Housing Units	Percentage of Housing Stock	Year to Year % Change
Built in 1939 or Earlier	165	7.0%	-13.6%
Built between 1940 and 1949	146	6.2%	-9.9%
Built between 1950 and 1959	311	13.3%	11.9%
Built between 1960 and 1969	222	9.5%	-9.0%
Built between 1970 and 1979	720	30.7%	2.9%
Built between 1980 and 1989	511	21.8%	32.4%
Built between 1990 and 1999	46	2.0%	-36.1%
Built between 2000 and 2009	203	8.7%	0.0%
Built between 2010 and 2019	19	0.8%	N/A
Total	*2,343*		

Source: (US Census Bureau, 2023)

According to the 2018 Regional Housing Needs Plan prepared by MCOG, the County of Mendocino will need 1,340 future housing units by 2027, 6.02% of which is expected to be in Willits (PlaceWorks, 2020). For Willits, the future housing allocation totaled 111 housing units. There are two income groups that make up over a third of future housing allocation each, these are “very low income” and “above moderate income”. These numbers are utilized by the cities and County in preparation of updates to their housing elements. The breakdown of housing allocation by income group is shown in the table below.

Table 3.14h: Future Housing Needs, 2018-2027 from the Willits Housing Element

Income Groups	Total Housing Units	Percentage
Extremely Low	**17**	**15%**
Very Low	17	**15%**
Low	25	23%
Moderate	17	15%
Above Moderate	34	31%
Total Units	*111*	

Source: (City of Willits, 2019)

D. EMPLOYMENT

Willits is one of several cities in the region, along with Ukiah and Fort Bragg, that serve as primary employment centers and produce commuting patterns to and from the surrounding residential communities. For this reason, employment information is useful for understanding potential housing trends but is not necessarily an accurate indicator for population and housing trends. Employment data is included here strictly for informational purposes only. According to the ACS 5-year estimate data for 2021, there were 1953 residents in the workforce for the City of Willits with a 41.4% employment rate (US Census Bureau, 2023). Of these workers 68.5% of workers commute to work with a mean travel time of 17.9 minutes.

The jobs-household ratio in a jurisdiction is an overall indicator of jobs availability within the area. A balance of jobs and housing can give residents an opportunity to work locally and avoid employment commutes to other places in the region. Most households have more than one worker; therefore, a ratio of jobs to housing should be above 1:1 to have a balance of jobs to households. Willits has an estimated 1,700 jobs and a ratio of 1.2 jobs per dwelling unit. That amounts to just over one job per household, which means that workers do not necessarily travel to other communities to find employment.

REGULATORY SETTING

FEDERAL

There are no applicable federal regulations for this analysis.

STATE

State Housing Element Law

California's housing element statutes, as outlined in Government Code Sections 65580-65589.9, mandate that local governments must effectively plan to address the current and projected housing needs across all economic segments within their communities. The law acknowledges that to adequately fulfill housing demands in the private market, local governments must establish land use plans and regulations that offer opportunities for housing development without imposing undue constraints. Consequently, the successful implementation of local general plans, with a specific focus on housing elements, is pivotal to state housing policy.

In line with California Government Code Section 65583, cities and counties are obligated to include a housing element as a fundamental component of their General Plan, with precise guidelines regarding its content. Section 65583(c)(7) necessitates that the Housing Element devises a strategy that encourages and facilitates the creation of accessory dwelling units, available at affordable rents for very low, low-, or moderate-income households as defined in Section 50053 of the Health and Safety Code.

Moreover, as per California Government Code Section 65583.2(g)(3), the Housing Element is mandated to incorporate a program outlining housing replacement requirements for specific sites identified in the inventory of sites. These requirements dictate that the replacement of units affordable to the same or lower income levels, consistent with the provisions of the State Density Bonus Law (Government Code Section 65915(c)(3)), becomes obligatory.

Additionally, California Government Code Section 65584(a)(1) assigns the responsibility of determining the regional housing needs assessment, segmented by income levels, to the California Department of Housing and Community Development (HCD). This assessment is established in collaboration with each region's planning body, known as a "council of governments" (COG), with the Mendocino Council of Governments (MCOG) serving Mendocino County and its cities. HCD initiates the housing needs assessment, coordinating with each COG to reach the final regional housing needs assessment. To date, there have been five prior housing element update cycles, and California is currently in its sixth update cycle. The MCOG RHNA and the City's General Plan Housing Element are further elaborated upon below. Furthermore, Government Code Section 65588 mandates that housing elements must undergo updates at least once every five years.

AB 1763

AB 1763, which became effective on January 1, 2020, is an amendment to California's State Density Bonus Law, as outlined in Section 65915 of the California Government Code. This amendment introduces changes to the law, impacting how density bonuses are provided to developers for affordable housing projects. It aims to enhance and streamline the process for obtaining density bonuses and incentives, making it easier for developers to include affordable housing in their projects. This amendment is part of California's ongoing efforts to address the housing affordability crisis by encouraging the construction of more affordable housing units.

Regional and Local

Regional Housing Needs Allocation

The State of California mandates the creation of the Regional Housing Needs Plan (RHNP), in accordance with Government Code Section 65584. This plan necessitates that regions address housing-related challenges and requirements, considering future growth projections for the area. The California Department of Housing and Community Development (HCD) allocates regional housing needs numbers to councils of governments across the state. In Mendocino County, the RHNP is developed by the Mendocino Council of Governments (MCOG), distributing to the cities of Ukiah, Fort Bragg, Willits, and Point Arena, as well as the unincorporated area of Mendocino County, their equitable allotment of the region's anticipated housing needs, commonly referred to as the Regional Housing Needs Allocation (RHNA).

Move 2030

The City of Willits falls within the jurisdiction of the Mendocino Council of Governments (MCOG) planning area. MCOG holds a critical role as the Metropolitan Planning Organization (MPO) for Mendocino County, responsible for implementing the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). MCOG is currently developing the latest RTP/SCS, called Move 2030, which aims to inform transportation and land use decisions through 2050. The MOVE 2030 Community Economic Action Plan is an effort which utilizes the power of locals who are taking a lead role in the economic revitalization of our community. Items listed in this Economic Action Plan have the potential to create lasting positive economic change because it reflects the work priorities of community stakeholders who are ultimately involved in implementation. The most recent RTP, adopted in 2018, serves as an extensive, long-term framework integrating transportation, land use, and housing strategies for Mendocino County. In February, 2022 MCOG released a draft Regional Transportation Plan & Active Transportation Plan.

Willits General Plan

The General Plan contains all required elements, based on California land use law. The City of Willits Housing Element was certified by State Housing and community Development in January 2020, and is intended to address the City's housing requirements during the 2019–2027 Housing Element planning period. This element articulates a set of strategies and policies aimed at comprehensively meeting the city's housing needs. It encompasses provisions for housing accessibility across diverse income levels, the promotion of affordable housing, the enforcement of equitable housing practices, and the assessment of suitable land for housing expansion. Integrated within the city's General Plan, the Housing Element functions as a roadmap guiding housing-related decision-making and development throughout the planning period.

Willits Municipal Code

Zoning Regulations. Title 17 of the Willits Municipal Code is the Willits Zoning Regulations which specify the regulations for development within the city by defining zoning districts, the procedures for permitting land uses, development standards, and development within the city's jurisdiction. This chapter is designed to facilitate housing development in a manner consistent with the Housing Element.

Subdivision. The Willits Subdivision Regulations, Title 16 of the Municipal Code, establishes rules, regulations, and processes for land subdivision and utilization within the city's incorporated area, consistent with the state Subdivision Map Act a. It governs various types of divisions, including those requiring tentative and final maps, as well as enables the reversion of previously divided lands back to larger acreage.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, impacts related to housing or population from implementation of the project would be significant if it would:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Trends in population and housing within the Project Area were evaluated using current available data sourced from the City of Willits, Mendocino County Regional Housing Needs Determination, California DOF, and the US Census Bureau. Impacts associated with population are typically within the realms of social and economic consequences and according to the California Environmental Quality Act (CEQA), a social or economic change is not generally deemed a significant environmental effect unless it can be directly correlated with a physical transformation.

PROJECT IMPACTS AND MITIGATION

Threshold Pop-1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impact POP-01: Implementation of the project would facilitate the construction of new housing to accommodate population growth, and development would be consistent with the General Plan and Land Use Element policies and implementation measures. Therefore, potential impacts resulting from unplanned direct and indirect population growth from the Project would be less than significant.

The Project is intended to accommodate population growth in the City. The current City population is similar to the population when the last City Land Use Element was adopted, 1992. Given the limited growth that has occurred in recent decades and the absence of compelling indicators of significant demographic or economic shifts in the City of Willits, the City of Willits has decided to use 7,500 persons (projected buildout used in the current General Plan) as the potential total City population at the end of the 20-year planning period, or 2043. This population projection has been the basis for current and past infrastructure and service planning (most notably the City water wastewater systems and planning for the

City's street network) and the City feels this growth level continue to be an appropriate and conservative buildout growth for the Land Use Element Update 20-year planning period. This EIR evaluates the impacts associated with the City's projected growth during the planning period, a total population of 7,500 in 2043.

To address population growth, the Land Use Element contains an implementation measure, LU-2A, that directs City staff to report annually on the City population in comparison to the buildout population contained in this General Plan, and where the Director of Community Development determines that actual rates of growth could result in a total City population level that exceeds that included in this General Plan during the planning period, the City Council shall be informed of the need to update the Land Use Element.

A purpose of the Land Use Element is to ensure that population growth occurs in a manner consistent with the General Plan. Given the current state housing crisis and state requirements for local governments to adequately the housing needs of the community, the development of additional housing units facilitated by the Land Use Element would meet the City's needs in an organized manner. The City is proposing to expand its Sphere of Influence to add additional land for potential future annexation, as needed. The City's intent is to plan this additional land for residential, industrial, and public facility development, increasing the available supply of residential lands in particular, to increase the likelihood that interested developers can find willing landowners to provide new housing units to accommodate growth. In addition, the General Plan includes programs to limit the potential for leapfrog development and to ensure that growth occurs in a logical manner. Considering that population growth and new developments would be guided by the General Plan and Land Use Element policies and implementation measures and would therefore not be unplanned, anticipated impacts from Project implementation is expected to be less than significant.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Threshold Pop-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact POP-02: The Land Use Element Update encourages infill and new development in an organized manner which would minimize the displacement of existing people or housing. It also incorporates community participation and environmental justice as part of land use policies. As such, the anticipated impacts of implementation of the Land Use Element would improve existing housing stock and provide new housing and result in a ***less than significant impact*** *on displacement of people or housing and/or construction of replacement of housing.*

The Land Use Element Update makes changes to land use designations in a manner that is intended to provide more residential housing opportunities for a wide range of demographics. "Substantial" displacement would occur if allowed land uses would displace more residences than would be

accommodated through growth facilitated by the project. The project would accommodate new development with increased residential densities and building intensities that would be allowed for the land use designations in the Land Use Element.

The purpose of the Land Use Element is intended to accommodate growth. None of the land use changes are intended displace people or housing, necessitating the construction of replacement housing elsewhere. Proposed Land Use Element Policy to carry out Goal LU-6 is intended to provide for compatibility between uses and greater zoning flexibility to respond to changing conditions and opportunities. Policy LU-6.3, Protect Long-Standing Compatible Uses in Older Neighborhoods, is intended to protect the ability of property owners of integral long-standing uses in older neighborhoods, in particular home owners in areas that are not planned for residential, and provide additional flexibility to the range of allowable uses. Policies LU-6.1, Limit Incompatible and Conflicting Uses, and LU-6.2, Compatible Development, are intended to protect existing neighborhoods from incompatible uses. Policy LU-7.5, Neighborhood Involvement in Decision-Making, requires that the City provide for the fair treatment and meaningful involvement in land use decisions and policies for all residents.

The proposed Land Use Element contains a series of policies and implementation programs with the purpose of preventing the displacement of current residents and housing as well as causing the development of replacement housing. Therefore, project implementation would be expected to result in a less than significant impact on displacement of people or housing and/or construction of replacement of housing.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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3.15 PUBLIC SERVICES

This section summarizes the public services, including fire and police protection, public schools, and public facilities that serve the Planning Area and analyzes the impacts on public services due to the project. Park services are not evaluated in this section and are fully addressed in section 4.17, Recreation. This section incorporates information and analysis from the 2016 Mendocino LAFCo Multi-District Fire Protection Services Municipal Service Review, the 2019 City of Willits Municipal Service Review and Sphere of Influence Update, and the 2020 Willits Unified School District General Plan Amendment and Rezone Initial Study/Mitigated Negative Declaration (IS/MND).

ENVIRONMENTAL SETTING

FIRE SERVICES

The City of Willits is within the Little Lake Fire Protection District (FPD), which is a single-purpose special district governed by an independently elected five-member Board of Directors. The Little Lake FPD provides full-service community fire protection services, which generally includes fire prevention and suppression, medical/rescue/extrication, and hazardous materials responses (Mendocino LAFCo, 2016). Fire prevention is provided in the form of planning and building application plan review and the inspection in State Fire Marshal mandated occupancies; voluntary continuing inspections of public and private property with the goal of improving fire safety and prevention in occupancies where there is no enforcement authority; working with several wildland/urban interface communities to improve survivability of homes and businesses threatened by wildland fires; and providing public education on fire safety through various types of public presentations. The District receives revenue from property tax and a fire suppression special tax and is receives reimbursement when the department responds to wildland fires in State Responsibility Area under mutual aid agreements with CALFIRE and the United States Forest Services (USFS); the majority of the department's wildland fire responses are reportedly uncompensated.

The Little Lake FPD covers an area of 239.4 square miles serving all of the City of Willits, as well as the highway corridors (Highways 101 and 20) and outlying rural areas (Mendocino LAFCo, 2019). This area includes Federal Bureau of Land Management (BLM) land on the eastern edge of the District, a small portion of the Jackson State Forest on the western boundary, and the City of Willits. Other fire-related districts in the region include the Brooktrails Township Community Services District (which provides fire protection services) adjacent to and west of Little Lake FPD, the Long Valley Fire Protection District to the northwest, the Potter Valley Community Services District (which provides fire protection services) to the southeast, and the Redwood Valley-Calpella Fire Protection District to the south. Little Lake FPD provides automatic aid fire protection to Brooktrails and maintains mutual aid agreements with Laytonville, Redwood Valley, and the CalFire for wildland fire. There is a countywide mutual aid agreement so that fire departments in Mendocino County respond, as available, to the needs of nearby fire departments.

Little Lake FPD has the following paid personnel: Division Chief/Fire Marshal, Deputy Chief, and a Secretary (Willits Little Lake Fire Protection District, 2023). There are two paid firefighters and 34 volunteer firefighters of which 7 are "Ridgewood Ranch Responders". Ridgewood Ranch Volunteers are volunteers who live and work at the ranch and provide assistance to emergency calls in the area just south of Willits and for the Seabiscuit Heritage Foundation. Of all the volunteer firefighters, 17 are also Emergency Medical Technicians (EMTs). The remainder are all trained as First Responders. Volunteers firefighters do not receive a stipend for their service. Little Lake FPD is continually recruiting, as volunteers are always needed and greatly appreciated. Volunteers have to undergo diverse training every first and fourth Tuesday, and for about 20 hours of special training on an annual basis.

The Little Lake FPD operates from two fire stations: Firehouse 54 and the Baechtel Substation. Firehouse 54 ("54" is the Mendocino County department number for the Little Lake FPD) was built in 2021 to update infrastructure, expand the stations capacity, and to replace the Main Station which was formerly located on the same location at 74 E. Commercial St. in Willits (Luna J. , 2022; Luna J. , 2021). The department doesn't currently have firefighters staying overnight at Station 54 but if the department does expand to have overnight stays in the future the station is equipped with four dorm rooms (one of which is ADA compliant) and a commercial kitchen. The station also has filling station for self contained breathing apparatus bottles after a fire and a turn-out dryer for gear, a training room, and a conference room that can double as a mini–Emergency Operations Center as needed. There is an expanded apparatus bay that hosts Little Lake FPD's fire trucks and engines with hydronic flooring to keep the water in the engines from freezing during colder months. There is also a shop/tool room, a locker room that contains the turnouts where firefighters get outfitted, a utility room, and a 270-square-foot recreation room. The Substation located at 1575 Baechtel Road in Willits is not staffed and contains apparatus and training facilities. The Substation allows Little Lake FPD quicker access to both sides of town.

Little Lake FPD has an Insurance Services Office (ISO) Property Protection Class (Class) of 03/3X, where Class 03 applies within the City of Willits and in adjacent areas within 1,000 feet of a fire hydrant, and Class 3X applies in outlying areas within 5-miles of a fire station but without a creditable water supply, and an ISO rating of 10 outside the 5-mile limit from a fire station (Insurance Services Office, 2022). Within the City of Willits and along major roads adjacent to the City where out of area water service is provided, water supply for firefighting is supplied by the City water and hydrant system; there are 298 fire hydrants on the City water system. However, in rural areas there are few or no hydrants available so the District mainly relies on Little Lake FPD water tenders and individual water tanks adjacent to their homes which a required part of the Mendocino County building permit process. Little Lake FPD has one 4000-gallon water tender, one 2000-gallon tactical water tender, each with portable water tanks, on-board tanks on each engine, and other available water sources such as ponds, creeks, swimming pools, and cisterns from which the Little Lake FPD can draft water.

Of the 600 reported annual emergency responses in 2016, approximately 73% were medical emergencies and around 12% were for fires and hazardous conditions. Personnel respond to many vehicle accidents outside the district, especially the nearby highways (101 and 20) which intersect with the City and have heavy tourist traffic. The Willits Police Department provides primary dispatch services for the Little Lake FPD, with Cal Fire as secondary dispatch.

The District operates and maintains four Type 1 engines, two Type 3 engines (4x4), one Type 1 truck company with a 75-foot ladder, one heavy rescue vehicle with 'jaws of life.' one Type 1 Haz-Mat trailer, two utility vehicles, one Type 1 4000-gallon water tender, two Quick Attack (4x4) vehicles, one swift water rescue trailer with boats, and one command vehicle. There is also an engine bought from the California Office of Emergency Services (OES) engine along with its tools and inventory of equipment for the purpose of rural firefighting by the Little Lake FPD.

Police Services

The Willits Police Department provides law enforcement services within the City of Willits but is not responsible for enforcing traffic laws on state highways which are under the California Highway Patrol's jurisdiction. The Willits Police Department operates from the joint County of Mendocino-City of Willits Justice Center located adjacent to City Hall at 125 East Commercial Street. Services are available 24 hours a day and seven days a week. The Police Department's services encompass a range of critical functions:

- **Police Administration:** This division, led by the Chief of Police, oversees the general administration of police services for the City.
- **Public Safety Dispatch:** They are the Public Safety Answering Point (PSAP) for emergency (9-1-1) calls within the City and in the surrounding area. Comprising nine personnel, this unit handles dispatch services not only for the Police Department but also for the Mendocino County Sheriff's Office, the California Highway Patrol, the Little Lake Fire Protection District, CALFIRE, and other city departments. Additionally, they manage records functions for the Police Department.
- **Field Operations:** Consisting of nine sworn officers, this team responds to various types of service calls and conducts investigations as single-officer patrols.
- **State Citizens Options for Public Safety (COPS) Program:** With one officer dedicated to community outreach efforts, school presentations, bike safety programs, neighborhood watch initiatives, and meetings.
- **School Resource Officer (SRO):** This officer, under the supervision of the Police Department, serves as the on-site Police Officer at both Willits High School and Baechtel Grove School, as well as peripheral locations. They provide essential law enforcement services to the schools and youth in the community.

When fully staffed, the Police Department is comprised of 16 full-time employees but as of September 2023 there were 11 staff in total (Sanderson, 2023). Current staff include: one interim police chief, one sergeant, six officers, two dispatchers, and 1 administrative assistant. The Police Department seeks to maintain a target ratio of at least 2.0 per 1000 residents but currently has a service ratio of 1.6 officers per 1000 residents (Mendocino LAFCo, 2019). It should be noted there have been significant staffing changes in the last couple of years and that the Department is actively looking for two police officers, a community services officer (who patrols but is not a sworn peace officer), a school resource officer, and dispatchers (Reith, 2023). As of September 7, 2023, the Police Department currently has an interim Police Chief (LaFever, 2023).

The Chief of Police reported in 2019 that property related crimes represent a significant portion of calls for service, as well as traffic enforcement and drugs infractions. The Police Department responded to 10,437 calls for service in 2017 and a projected 11,941 calls for service in 2018. In 2019, the Willits Police Department made a total of 967 arrests.

The Mendocino County Sheriff's Office is responsible for law enforcement within the portions of the Planning Area outside the City of Willis and has a substation in the City of Willits located at 470 East Velly Street. The California Highway Patrol is responsible for enforcing traffic laws on roadways within the unincorporated areas.

Schools

Willits Unified School District operates all the public schools in the City of Willits area as well as some nearby rural communities. The District has a current enrollment of 1534 students in grades TK–12 from the City of Willits and surrounding areas. The District Superintendent Mark Beebe reports that the District employees 105 teachers resulting in a teacher to student ratio of roughly 15 to 1 (Beebe, 2023). The district is composed of four traditional schools and two alternative programs that offer students a variety of choices within their district's governance. There are an additional three charter schools in the area for a total of 1,871 total students in the school system. The table below provides additional descriptive information about public school services and enrollment.

Table 3.15a: Willits Public School 2022-23 K-12 Enrollment

School Name	Type	Grades	Willits Unified	Total Enrollment	Enrollment within Planning Area
Baechtel Grove Middle School	Traditional	6-8	270	270	270
Blosser Lane Elementary School	Traditional	3-5	351	351	351
Brookside Elementary	Traditional	TK-2	363	363	363
Sherwood Elementary School	Alternative	K-8	68	68	-
La Vida Charter	Alternative	K-12	-	79	-
Sanhedrin Vocational Alternative High School	Alternative	9-12	67	67	67
Willits Charter	Alternative	K-12	-	113	113
Willits Elementary Charter	Alternative	K-5	-	145	145
Willits High School	Traditional	9-12	415	415	415
Total			***1,534***	***1,871***	***1,724***

Source: (California Department of Education, 2023)

The District Superintendent Mark Beebe reported the projected enrollment for the Willits Unified is 1,550 students and that facility student capacity has not changed since 2020 (Beebe, 2023). Total enrollment for the Willits area (including charter and non-charter schools) has decreased .39% since 2017-2018 but is projected to increase by 1.04% using the reported number above (California Department of Education, 2023). The table below provides a multiyear description of enrollment for schools in the Willits area. The City population has not experienced substantial change in the last 20 years and there are no certain population projections available for the future. However, Mendocino County population projections are expected to decrease 2.1% by 2050 (California Department of Finance, 2023). This is reflected in Mendocino County's total TK-12 school enrollment which has decreased 2.70% since 2017-2018. Future school enrollment for the County are projected to decrease an additional 1.32% next year and will decrease by 9.26% by 2033 (California Department of Finance, 2022).

Table 3.15b: Willits Unified School District 2022-23 Enrollment Multi-Year Summary for Charter and Non-Charter Schools

Academic Year	Charter School TK- 12 Enrollment	Non-Charter School TK-12 Enrollment	Total TK-12 Enrollment
2022-23	337	1534	1,871
2021-22	338	1501	1,839
2020-21	264	1504	1,868
2019-20	352	1561	1,913
2018-19	335	1512	1,847
2017-18	355	1540	1,895
2016-17	345	1539	1,884
2015-16	351	1519	1,870
2014-15	345	1597	1,942

Source: (California Department of Education, 2023)

There is one higher educational institution within the Planning Area. Mendocino College is a community college in the Mendocino-Lake Community College District with a location in Willits called the North County Center. Max capacity enrollment for the North County Center is around 1200 full and part-time

students with 600-700 individual full-time equivalent students attending roughly 12 hours a week per student at both the center and online (Mendocino-Lake Community College District, 2011). Their current enrollment for Fall 2023 is 412 individuals with 345 in person headcount (Flores, 2023). The faculty and staff at the central location in downtown Willits serve a small selection of classes, programs, and services to the communities of Willits, Laytonville, Round Valley and Anderson Valley. There are three North County Center staff and 21 members of faculty in September 2023 (Mendocino College, 2023). This gives the North County Center a student to faculty ratio of 19.6.

Parks

The evaluation of Park services are fully addressed in section 4.16, Recreation.

Other

Aside from the public services already highlighted, the City provides a wide range of municipal services. A notable public service not otherwise covered in separate sections is the Willits Municipal Airport (FAA LID O28), also known as Ells Field, which is owned by the City but managed under contract by Mulligan Aviation. This public airport facility is one of two incorporated islands of the City separated from the core City limits, located on 76-acres approximately 3 miles northwest of the City core a. The airport began private operations in the 1960s by the Deerwood Corporation as a destination for flights from Oakland to prospective buyers of parcels in the adjacent Brooktrails Vacation Village subdivision known today as Brooktrails Township. The Airport property was donated to the City in 1964 (Mendocino LAFCo, 2019).

The Airport is used for General Aviation and recreation-oriented flights. Facilities at the airport include a single 3,000-foot runway (16-34), 23 hangars on-site for rent and 25 tie-downs available for $5.00 per night, lights for night operations, a 24-hour self-serve fueling station, and the Pilot Cave facility which includes a pilot's lounge, restrooms, showers, kitchen, and outdoor picnic tables. REACH Air Medical Services has a helicopter for medical transport services at the Municipal Airport (Mendocino LAFCo, 2019; City of Willits, 2023).

The airport enterprise service also operates at a deficit, although the shortfall is relatively small and has been offset by grants from federal and state agencies. In 2016 and 2017, the airport operated at a surplus due to an increase in hangar fees adopted in 2016, new tenants at the airport, grants, and greater operating efficiencies. The City receives income from emergency response operations requiring the use of the Municipal Airport for Helibase operations; for example, the City has billed the Mendocino National Forest in the amount of $40,500 for the Eel and Mendocino Complex Fire incidents (Mendocino LAFCo, 2019).

Regulatory Setting

Federal

Executive Order 13855

Secretary Order 3372 (Reducing Wildfire Risks on Department of the Interior Land Through Active Management) provides specific directions and timelines to the bureaus in the Department of the Interior that play a role in managing wildland fire as they work to meet the mandates of Executive Order 13855. Executive Order 13855 emphasizes that federal agencies must collaborate with state and local institutions and incorporate active management principles into all land management planning efforts in order to address the challenges of wildland fire. Section 5 of the executive order directs the Secretaries of Interior and Agriculture to jointly develop a Wildfire Strategy in collaboration with Federal, State, tribal, and local partners, by December 31, 2020 that supports local Federal land managers in project decision-

making and informs local fire management decisions related to forests, rangelands, and other Federal lands, thereby protecting habitats and communities, and reducing risks to physical infrastructure.

STATE

California Fire and Building Code

The State of California provides minimum standards for building design through the California Building Code (CBC), which is in Part 2 of Title 24, California Building Standards Code, of the California Code of Regulations (CCR). The CBC is based on the International Building Code but has been amended for California conditions. The Wildland Urban Interface Fire Area Building Standards, or the Wildland Urban Interface Codes establish minimum standards for materials and material assemblies and provide a reasonable level of exterior wildfire exposure protection for buildings in Wildland-Urban Interface Fire Areas. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local building officials for compliance with the CBC. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Occupational Safety and Health Administration

In accordance with California Code of Regulations Title 8 Sections 1270 “Fire Prevention” and 6773 “Fire Protection and Fire Equipment,” the California Occupational Safety and Health Administration (Cal OSHA) has established minimum occupational standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

School Facilities Act of 1986

California State Assembly Bill (AB) 2926 – School Facilities Act of 1986 – was enacted by the State of California in 1986 and added to the California Government Code (Section 65995). It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established that the maximum fees which may be collected under this, and any other school fee authorization are $1.50 per square foot ($1.50/ft2) for residential development and $0.25/ft2 for commercial and industrial development. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government code. Under this statute, payment of statutory fees by developers serves as total mitigation under CEQA to satisfy the impact of development on school facilities. However, subsequent legislative actions have alternatively expanded and contracted the limits placed on school fees by AB 2926.

School Facilities Needs Analysis

As part of the further refinement of the legislation enacted under AB 2926, the passage of SB 50 in 1998 defined the Needs Analysis process in government Code Sections 65995.5-65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity because of development. SB 50 generally provides for a 50/50 State and local school facilities match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available; whether the school district is eligible for State funding; and whether the school

district meets certain additional criteria involving bonding capacity, year-round schools, and the percentage of moveable classrooms in use. California Education Code section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

Mitigation Fee Act

The Mitigation Fee Act (Government Code section 66000 et seq.) establishes a framework for local agencies to impose development impact fees on new construction projects. These fees are intended to mitigate the impacts of development on public facilities and services, such as transportation, parks, and infrastructure. The Act requires agencies to follow specific procedures, including conducting nexus studies to demonstrate a reasonable relationship between the fee charged and the impact created by the development. It also mandates transparency in fee administration, including public hearings, notice requirements, and periodic reporting. The Act aims to ensure that impact fees are fair, reasonable, and directly related to the costs of providing necessary public services to accommodate new growth. The Mendocino County Fire Protection Mitigation Fee Ordinance is pursuant to the Mitigation Fee Act.

Regional and Local

Little Lake Fire District Impact Fee-Mendocino County

Chapter 5.36 of the Mendocino County Code details the Fire Protection Mitigation Fee Ordinance which establishes procedures for the adoption of fire protection mitigation fees that are applicable within specific fire district and the collection of these fees in connection with the issuance of building permits. The Little Lake Fire Protection District took necessary steps to adopt a fire protection mitigation fee in 2021, which are now collected on the District's behalf by the County. The following are the approved Fees on new development to be collected upon issuance of a building permit:

Table 3.15c: Little Lake Fire Protection District Impact Fee

Land Use	**Fire Impact Fees**
Residential Development	**Per Living Area Sq. Ft.**
Single Family Housing	$0.98
Multi-Family Housing	$1.06
Mobile Home	$0.94
Accessory Dwelling Unit	Pursuant to Govt. Code Section 65852.2(f)(3)(A), the fire impact fee for an accessory dwelling unit shall be imposed proportionately in relation to the square footage of the primary dwelling unit. Accessory dwelling units less than 750 square feet of living area are exempt.
Nonresidential Development	**Per Living Area Sq. Ft.**
Retail/Commercial	$0.99
Office	$1.35
Industrial	$1.06
Agriculture	$0.60
Warehouse/Distribution	$0.65

Willits General Plan

The Willits General Plan Revision – Vision 2020 was adopted in 1992 and the Housing Element is the first Element to be updated since in 2019. Senate Bills 1241 and 1035 mandates that local jurisdictions like the City will update Safety Element to address wildfire and climate adaptation and resiliency. Both of these requirements have been included in Government Code Section 65302 (g) 1 through 4, requiring Cities to address these issues each time they update their Housing Elements.

Section 1.240 of the Land Use Policies directs the City consider annexations which are consistent with the extension of public services and facilities and other City policies and plans. Possible future annexation sites are shown on Exhibit 3-2 of the Technical Appendices (Volume 2).

Section 2.230 in the Circulation Policies encourage the City to enhance the availability and accessibility of alternative modes of transportation, such as walking, bicycling, carpools and buses. Incorporate mass transit facilities such as bus shelters and park and ride lots into the design of public and private development projects.

Section 2.340 in the Circulation Implementation Measures designates a network of bicycle routes providing safe passage throughout the City; establish linkages between schools and the designated bikeway.

Section 4.233 in the Circulation Implementation Measures requires the City to designate a bicycle route and distribute maps of the bikeway to schools and other interested individuals and organizations as a means of encouraging bicycle use.

Section 4.332 in the Conservation and Open Space Mitigation Measures mandates that the City "shall establish criteria in consultation with the Mendocino APCD to determine the significance of air quality impacts of proposed developments in conjunction with environmental review. Such criteria should consider if potential emissions will cause air quality standards to be exceeded, if the proposed project is consistent with the adopted air quality management plan, and if the proposed project would expose sensitive receptors (schools, hospitals, convalescent homes) to substantial pollutant concentrations. Appropriate mitigation measures shall also be required for proposed developments."

Sections 7.210-7.230 of the Safety Policies include:

- Cooperate with the Little Lake Fire District in developing standards and guidelines to assure adequate fire protection and the provision of medical and other emergency services for all persons and property in the community.
- Encourage installation of fire safety devices in all residences and require such installation at the time of original construction, remodeling or expansion.
- Establish five minutes or two miles travel distance as the minimum response time or travel distance from the nearest fire station. Outside of this response range, built-in fire protection systems (i.e., sprinklers) shall be required in all new buildings.

Sections 7.310-7.360 of the Safety Implementation Measures include:

- The Little Lake Fire District shall review all proposed construction projects prior to permit issuance. Conditions of approval pertaining to water supply adequacy, emergency vehicle access, road widths, turning radii and building design features may be submitted by the District based upon its review.

- Maintain regular fire and seismic safety inspection programs, with priority given to emergency facilities, public buildings and older structures.
- Enact zoning ordinance revisions to require built-in fire protection systems for all structures outside of the maximum response range of the Little Lake Fire District.
- Establish inspection procedures to ensure that all grading and foundation work is observed and documented at critical stages of construction.
- Consider fire, flooding, geologic and seismic safety risks in reviewing proposals for development.
- Identify and alleviate safety·hazards associated with underground fuel tanks.

Willits Municipal Code

Little Lake Fire District Impact Fee. Chapter 15.06 of the Willits Municipal Code establishes the Little Lake Fire District Impact Fees which are identical to the description of the Little Lake FPD fees described above, and are imposed by the City on behalf of the District. The fee amounts are identical to those listed above for the Little Lake Fire District Impact Fee-Mendocino County.

Nuisance Regulations. Nuisance Ordinance, Chapter8.20.020 of the Willits Municipal Code prohibits the establishment, continuation, or upkeep of any condition classified as a nuisance by city ordinances, code sections, council resolutions, or state statutes, deeming such actions unlawful and subject to misdemeanor charges. Conditions which constitute a nuisance including Subsection B which is a fire hazard as defined in the Uniform Fire Code.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, impacts related to recreation from implementation of the project would be significant if it would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:
    a) fire protection
    b) police protection
    c) schools
    d) parks
    e) other public facilities

Public services assessment involved a review of previous municipal service reviews and data available on fire protection, police protection, schools, and other public facilities from sources such as Google maps, California Department of Education, and contact with public service staff provided data. An adverse effect would occur if a proposed development would have an impact on these public services and their ability to adequately serve the local population.

PROJECT IMPACTS AND MITIGATION

Threshold PS-01a: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Impact PS-01: Implementation of the Project would facilitate development. An increase in population and structures would increase demand for fire protection services and could create the need for new or expanded fire protection facilities and equipment. General Plan policies direct the City to cooperate with Little Lake FPD in developing standards and guidelines to assure adequate fire protection to accommodate population growth. Therefore, impacts to fire protection services would be ***less than significant.***

Little Lake FPD provides fire protection services to a 239.4 square mile District, that includes the entire Planning Area, operating from two stations within the City of Willits: Firehouse 54 (headquarters station) at 74 E. Commercial St and Baechtel Substation at 1575 Baechtel Road. Firehouse 54 was reconstructed with grant funding and the project was completed in December of 2021.

Future development within the Proposed SOI Expansion Areas and Land Use Change Areas within the City allowed by the Land Use Element Update would result in an increase in residents and visitors that would increase the need for services from the Little Lake FPD. The Proposed Land Use Change Areas and Proposed SOI areas are predominantly located to the west and to the south of City boundaries. Station 54 and the Baechtel substation are located in downtown Willits and the southern portion of Willits respectively.

The Willits General Plan (policy 7.230) establishes a five-minute maximum response time or two-mile travel distance from the nearest fire station. According to Google Maps estimates, the drive time from Station 54 and the Baechtel Substation during regular day time traffic will take roughly 4-5 minutes to reach the western most point of West State Route 20 sphere of influence which is roughly a 3-mile drive from the closest fire station (Station 54). Using the same method of analysis, it takes 7-8 minutes to reach the southernmost tip of the Southern Estates Residential Land Use Change area is just under a 2-mile drive from the nearest fire protection facility (Baechtel substation). Both of these estimates were calculated using coordinates at the farthest proposed residential land use designations away from current City limits (Google, 2023) and within the performance criteria of policy 7.230.

There are roughly 36 career and volunteer firefighters serving a District population of approximately 10,000, 4,920 of which reside within the City of Willits. The projected population increase within the City of Willits to a population of 7,500 residents during the Planning Period would increase the service demand and decrease the ratio of firefighters to service population. However, most Little Lake FPD firefighters are volunteers who operate from fire stations within the City of Willits and an increase in population within Wililts would also increase the available number of residents who could become District volunteer firefighters.

The General Plan Safety Element contains a series of policies and implementation programs intended to ensure that the City maintains an acceptable service ratio, response time, and other performance objectives for fire protection. Relevant policies and implementations are listed below.

- 7.210 directs the City to cooperate with the Little Lake Fire District in developing standards and guidelines to assure adequate fire protection.
- 7.230 establishes five minutes or two miles travel distance as the minimum response time or travel distance from the nearest fire station.
- 7.310 requires project review by the Little Lake FPD for all construction projects prior to permit issuance.

The proposed Land Use Element contains goals and policies to promote growth within infill and redevelopment sites near neighborhood commercial areas (LU-2.4, Infill Development) and to ensure that land use decisions protect and sustain important natural resources and limit exposure to hazards (LU-8.6, Emergency Evacuation).

There is the potential that population growth and development facilitated by the Land Use Element Update will increase the use and congestion of travel routes and maximum response times cannot be met or that additional firefighters or apparatus needed to maintain service ratios trigger the need for new fire facilities. All new developments will be required by the City to pay the Little Lake FPD mitigation fee with permit issuance, which will represent each development's proportional share of needed new facilities.

Given that the Little Lake FPD recently reconstructed its headquarters fire station, significant facility expansions may not be required. If expanded facilities are required, both stations are within urbanized areas and could possibly be expanded within the footprint of the existing developed area. If new fire facilities are needed, such facilities would likely be constructed where existing roads, utilities, and infrastructure is available. Building designs would need to take into consideration geologic hazards, hydrology, water quality, erosion, and drainage; water quality, erosion and drainage; air quality; sensitive flora and fauna; streams, and wetlands, and riparian areas; traffic safety and circulation; utilities and public services; aesthetics; cultural resources; hazardous materials; and noise. However, the specific impacts of prospective new fire protection facilities cannot be ascertained until they are proposed and undergo environmental review.

Any expansion of fire protection facilities to accommodating growth will be subject to compliance with existing General Plan policies, Zoning Regulations, and building codes and be required undergo additional CEQA review. The City General Plan and CEQA require that potential significant environmental effects be identified and that feasible mitigation measures be included as conditions of project approval and effectively implemented and maintained over the long term. Consequently, with the implementation of existing General Plan and proposed new Land Use Element policy, substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities triggered by the Land Use Element would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold PS-01b: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Impact PS-01b: Implementation of the Project would facilitate development to accommodate population growth. The increase in estimated population would increase demand for police protection services but not beyond the capacity of the current facility to meet the increased demand at an acceptable service ratio. Therefore, there is no foreseeable need to physically alter or build new government facilities and the physical impact on the environment from implementation of the Project is expected to be ***less than significant.***

Future development facilitated by the project would result in an increase in residents and visitors that would also increase the need for services from the Willits Police Department. There are currently 8 officers serving a population of 4,920 residents. This results in a current service ratio of 1.63 officers per 1000 residents, although the City seeks to achieve a target service ratio of 2.0 officers per 1000 residents. The proposed build-out population of 7,500 residents would add an additional 2,580 residents bringing the Willits Police Department's service ratio down to 1.1 officers per 1,000 residents. However, if the Police Department was able to successfully hire the additional four officers they are currently recruiting while maintaining their current staff, their adjusted ratio would be 1.6 officers per 1,000 residents which is not to the Department's target service ratio but maintains its current service level. In addition, in case of emergency that necessitates additional police assistance, the Willits Police Department also has a good working relationship with the Mendocino County Sheriff's Office and other neighboring police departments. There is also a Mendocino County Sheriff's Office with staff located within the City who can assist.

Without additional City of Willits officers and support staff, population growth from new development allowed by the Project would result in an unsatisfactory service ratio for the Police Department. However, acquiring additional staff or purchasing additional equipment would likely not result in the physical alteration of government facilities because the current ratio is accommodated within existing facilities. As mentioned earlier, full staffing of the current facility would still accommodate the Police Department's current ratio of 1.6 officers per 1,000 residents with the additional 2,580 residents that would come with the proposed build out population. Therefore, the physical impact on government facilities from implementation of the Project is expected to be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold PS-01c: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

Impact PS-01c: Because TK-12 grade school enrollment at Willits Unified School District is not anticipated to exceed capacity with population growth and campus grounds have space for expansion from new additions or modular units, impacts are expected to be ***less than significant.***

Future development facilitated by the project would result in an increase in residents that would also increase the need for services from schools. The Project proposes to change General Plan land uses and expand the City's sphere of influence. Proposed land uses within the City and Proposed SOI allow higher density residential development as well as additional land for commercial and industrial development. As such, the future residential development facilitated by the Project would result in new residents, including school-aged children.

Future school enrollment for the County is projected to decrease 1.32% next year and to decrease by 9.26% by 2033. Willits Schools have decreased slightly since 2017-2018 but are projected to increase by over one percent in 2023. While potential future development consistent with the Land Use Element Update policy would likely result in increased enrollment in nearby public schools, the Willits Unified School District could add new additions and/or modulars if potential future enrollment exceeds the capacity of these educational facilities. As for higher education opportunities, the Mendocino College North County Center is currently at roughly 59-69% of full capacity. The current enrollment and campus capacity allows for room to accommodate an additional influx of college age individuals associated with potential population growth without additional facilities.

The City of Willits General Plan Public Services and Facilities, Parks and Recreation Element contains Policy 6.210, which ensures that development occurs in a manner which is consistent with the ability of local public agencies to provide adequate services and facilities within an efficient cost framework, including schools. In addition, new development is subject to the payment of school impact fees, which serve to finance essential improvements and contribute fair share costs associated with introducing new students to the area. Consequently, the Project and the future development of the site are anticipated to have a minimal impact on public TK-12 school capacity.

Should new residential development allowed by the Project increase enrollment levels to such an extent that is exceeds school district capacity, the development of new school facilities by the school district would be subject to CEQA. The responsible school district would be required to evaluate potential significant environmental effects associated with new school facilities and implement any necessary feasible mitigation measures to reduce significant environmental impacts to less than significant levels.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold PS-01d: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain performance objectives for parks?

Impact PS-01d: Park services are not evaluated in this section, this is fully discussed in section 4.17, Recreation under Threshold REC-02 .

Park services are fully addressed in section 4.17, Recreation.

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3.16 RECREATION

This section analyzes the impacts to parks and recreational resources within the Project Area. This section incorporates information and analysis from the 2019 City of Willits Municipal Service Review and Sphere of Influence Update and the 2022 Willits Rail with Trail Project Initial Study/Mitigated Negative Declaration.

ENVIRONMENTAL SETTING

Parks, recreation opportunities, and open space areas are important elements of the urban environment. The City of Willits is located within Mendocino County, which has a wealth of outdoor recreational opportunities. The City provides recreational services to not only residents of the City but also to visitors and residents of the surrounding area. The City of Willits Public Works Department is responsible for the management and maintenance of the City's recreation facilities. In addition to parks located within the City, there are also recreational opportunities provided within nearby privately held open space not controlled by the City.

Parks and Park Infrastructure

According to the National Recreation and Park Association (NRPA) Park Classification System, the City manages an extensive park system comprised of eleven distinct facilities encompassing 38.34 acres of park and recreational resources. This diverse range of parks and facilities provide a wide array of recreational opportunities for the community and region. These facilities encompass three community parks, four neighborhood parks, one natural area (linear park), and three special use facilities. The table below provides additional descriptive information about City of Willits Parks resources (see Figure 3.16a City of Willits Parks and Recreation Facilities)

Table 3.16a: Description of Willits Park Resources

Park Type and Name	General Description of Facilities	Acres
Total Community Park Acres		***18.99***
City Ball Fields	Soccer field and two baseball fields	8.61
Recreation Grove Park	Picnic, playgrounds, bathroom, basketball court	4.96
Carnival Grounds	Two baseball fields (near the Willits Rodeo Grounds)	5.43
Total Neighborhood Acres		***3.74***
"Bud" Snider Park	Plaza, playground and lawn area	1.75
Babcock Park	Lawn, passive recreation, fountain	0.39
Haehl Creek Subdivision Park	Lawn area, passive recreation	0.46
Hwy 20 Park	Lawn area, passive recreation	1.13
Total (Linear Park) Natural Area Acres		***13.07***
Haehl Creek Park	Open space, passive recreation, walk/bike trails	13.07

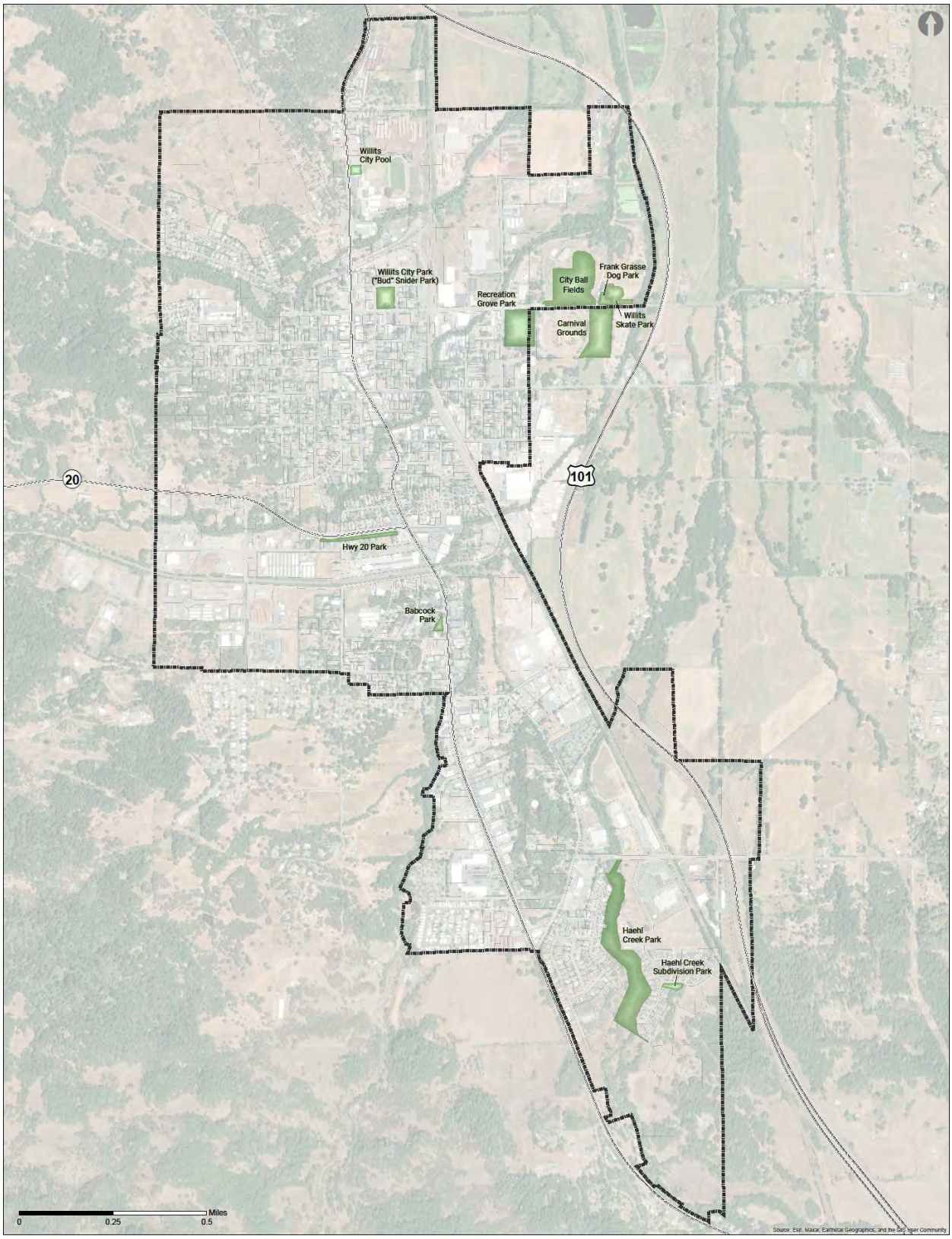
Park Type and Name	General Description of Facilities	Acres
Total Special Use Acres		***2.54***
Frank Grasse Dog Park	Dog park	0.66
Willits City Pool	Willits High School Pool - Summer Use via MOU	0.46
Willits Skate Park	Skate park	1.42
Grand Total		***38.34***

In addition, the City operates the Willits Community Center, which is used for recreation programs and public and private events, and owns the land that contains the Willits Library, the Mendocino County Museum and Roots of Motive Power, and the Willits Rodeo Ground, primarily for use by the Willits Frontier Days Association. In addition to City owned parks and other recreational facilities, there are three school sites with fields and play structures that are informally available to residents and may be used as neighborhood parks.

Park and recreation facilities, including the Willits High School pool during summer months, are maintained by the City Public Works Department. The City uses fees and General Fund revenue to support City parks and recreation facilities and the City has a goal to improve accessibility to City parks, pave the City Ballfields parking lot, and rehabilitate old fields and buildings at sports complex. The Willits High School pool is available to the public during the summer months (June to August) through City funding, and during September and October part-time use, though an agreement with Willits Unified School District for recreation purposes. Pool activities include swimming lessons and water aerobics. A fee is charged to the public and used to partially offset the maintenance, utilities, and other costs of operating the pool. A number of seasonal employees are hired each year, including a Pool Manager, Assistant Pool Manager, Swim Instructors, and Lifeguards, to staff and supervise the use of the pool. Swimming Pool Operations are managed through the City Managers' office. Since 2012 the pool has been open for additional hours for private swim lessons and water aerobics.

Most of the City park facilities, especially those parks with improved recreational facilities, are located along East Commercial Street in the north/east portion of the City. The Highway 20 linear park and Babcock Park, which do not contain active recreation improvements, are located in the central portion of the City. In addition to two neighborhood parks, Baechtel Grove Middle School, Blosser Lane Elementary School, and the Willits Kids Club are located in the central portion of the City of Willits. Haehl Creek Park, which is comprised of approximately 0.5 miles of the Haehl Creek riparian area contains walking and biking trails, and the Haehl Creek Subdivision Park, containing a lawn area, area located in the southern portion of the City. See Figure 3.16a City of Willits Parks and Recreation Facilities, below.

Figure 3.16a City of Willits Parks and Recreation Facilities



Future Additional Recreational Opportunities

The Willits Rail with Trail Project is a proposed 1.6-mile Class I Trail (pedestrian and bicycle trail) from East Commercial Street to East Hill Road within the Great Redwood Trail Agency (GRTA) right of way (formerly the North Coast Railroad Authority [NCRA]), within the City limits (GHD, 2022). Further, the trail would eventually provide linkages beyond the City into parts of the County, the City of Ukiah, and beyond as part of the proposed Great Redwood Trail, which is planned to span between Eureka and the North Bay Area. It would also connect to the Haehl Creek Trail, located near the Frank R. Howard Memorial Hospital.

The City has expressed interest in identifying more potential parkland and exploring the possibility of a regional park and recreation district to consultants. If this were to move forward, the City wants to establish a regional funding source.

REGULATORY SETTING

FEDERAL

National Trails System Act

The National Trails System Act of 1968 (P.L. 90-453) authorizes a national system of trails in order to provide additional outdoor recreation opportunities and to promote the preservation of access to outdoor areas and national historic resources. The National Trails System was created by the National Trail System Act. Four classes of trails were formed by the system.

- National Scenic Trails (NST) provide outdoor recreation and the conservation and enjoyment of significant scenic, historic, natural, or cultural qualities.
- National Historic Trails (NHT) follow travel routes of national historic significance.
- National Recreational Trails (NRT) are in, or reasonably accessible to, urban areas on federal, state, or private lands.
- Connecting or Side Trails provider access to or among the other classes of trails.

Railbanking, established in 1983 as an amendment to Section 8(d) of the National Trails System Act, is a voluntary agreement between a railroad company and a trail sponsor (such as a trail organization or government agency) to use an out-of-service rail corridor as a trail until a railroad might need the corridor again for rail service. This interim trail use of railbanked corridors has preserved thousands of miles of rail corridors that would otherwise have been abandoned.

National Recreation and Park Association (NRPA) Park Classification System

The National Recreation and Park Association (NRPA) is a nonprofit organization in the United States dedicated to advancing the field of parks, recreation, and community services. It provides resources, advocacy, and support for professionals and agencies involved in managing parks and recreational spaces. NRPA's mission is to promote the importance of parks and recreation in enhancing the quality of life for communities and individuals. It offers educational programs, research, and initiatives to help create and maintain vibrant, healthy, and accessible parks and recreational facilities across the country. NRPA has defined a park classification system for use in planning to help define appropriate levels of service for various types of parkland. This classification system is broadly accepted as a tool for analyzing park and recreational services. NRPA park standards applicable to City of Willits parks are described below.

Table 3.16b: NRPA Park Standards

Park Classification	Service Area	Facility Characteristics	Park Standard
Community Park	Several Neighborhoods 1/2 to 3 Mile Radius 5.0–8.0 acres / 1,000 residents	A community park may be a natural area or developed area for a variety of outdoor recreation such as ballfields, playgrounds, boating, fishing, swimming, camping, picnicking, and trail systems.	Park Size: typically, 16 –99 Acres
Neighborhood Park	Assumed Service Areas: 1.0–2.0 acres / 1,000 residents	A neighborhood park is an area for active recreation such as field games, court games, playgrounds, picnicking, etc. Facilities are generally unlighted and there is limited parking, if any, on site.	Park Size: typically, 1 –15 Acres
Special Use Areas	No Applicable Standard Varies Depending on Desired Size	Areas and parks are for specialized or single purpose recreation activities	Variable
Natural Area (Linear Park)	No Applicable Standard Sufficient Width to protect the resource and provide maximum usage	A natural area or linear park is developed for one or more modes of recreational travel such as walking, jogging, biking, hiking, and horseback riding	Variable

STATE

State Public Park Preservation Act

The State Public Park Preservation Act of 1971 (California Public Resource Code Section 5400 – 5409) serves as the key tool for safeguarding and conserving parkland in California. It prohibits cities and counties from repurposing any publicly used park property for non-park purposes without providing compensation or replacement land, or both, to maintain a balance and prevent any loss of parkland and its associated amenities. This ensures the preservation and continuity of parks and their facilities.

California Parklands Act

The California Parklands Act of 1980 (Pub. Res. Code Section 5096.141-5096.143) recognizes the significance of acquiring, developing, and restoring areas for recreation, both at the state and local level. The Act underscores the responsibility of local agencies to protect existing parks, recreation areas, and facilities from being repurposed for other uses.

Quimby Act

The Quimby Act of 1975 (California Government Code Section 66477) is part of the Subdivision Map Act and grants cities and counties the authority to adopt an ordinance to establish park dedication standards, consistent with the adopted general plan containing policies and standards for parks and recreational facilities, that mandate subdividers to allocate land, contribute conservation easements, or make financial contributions toward the creation of parkland as a condition to the approval of a tentative map or parcel map, This ensures the integration of recreational spaces and amenities within new developments, promoting a balanced and sustainable community environment. The Quimby Act requires that subdivisions or residential developments in California provide a certain amount of parkland or pay fees in lieu of providing parkland. Specifically, it typically mandates dedicating 3 acres of parkland per 1,000 residents for residential development. However, the requirements may vary by local jurisdiction and could be subject to specific ordinances and regulations established by individual cities or counties within California.

Great Redwood Trail Act

The Great Redwood Trail Act of 2021 (California Code Government Code Section 93000-93030) enabled the conversion of the derelict railroad corridor into a recreational resource and economic driver for Northern California communities. This act transformed the “North Coast Railroad Authority” into the “Great Redwood Trail Authority” and gave it additional authority pertaining to the initiation, creation, and maintenance of the Great Redwood Trail. Subject to funding, the Great Redwood Trail Authority is required to initiate the federal Surface Transportation Board’s railbanking process, inventory rail rights-of-way assets, conduct environmental assessments, engage the community, honor existing trail licenses, utilize conservation corps services, and prepare a master plan with environmental analysis. All of which would be included in an annual progress report on how the Great Redwood Trail Authority was meeting rail right-of-way-requirements submitted to the Legislature. They may also contract trail management, excursion rail services, and collaborate with stakeholders for fishing and river access. The Great Redwood Trail runs through the center of Willits and part of the railway is currently utilized by a local tourist attraction called the Skunk Train.

Regional and Local

Mendocino County Equestrian and Hiking Trail Plan

Added as an amendment to the Recreation Element in 1967 and updated in 1991, the purpose of the Equestrian and Hiking Plan is to provide a policy plan for the establishment and implementation of an all-purpose non-motorized trail system throughout the unincorporated areas of the county, specifically for

equestrian and hiking trails, with consideration of future bicycling facilities. A major function of the plan is to coordinate county trails with existing or future systems planned by other governmental agencies, i.e., Bureau of Land Management, Great Redwood Trail Agency, etc.

Mendocino County Code

Section 14.08.010 of the Mendocino County Code designates recreation areas in the county. Section 14.08.010 (A) details the Brooktrails Area which is one such recreation area located near Willits. This recreation area has a community subject to additional prohibitions and regulations outlined in the rest of the section (County of Mendocino 2023).

Willits General Plan

The Willits General Plan Revision – Vision 2020 was adopted in 1992. The Public Services and Facilities, Parks and Recreation Element (Section 6) contain policies that aim to ensure that development aligns with the capacity of local agencies to provide services and facilities efficiently. It emphasizes evaluating and improving water, sewer, storm drainage, and service delivery systems. The goal is to distribute parks more equitably and maintain a minimum standard of five acres of parkland per 1,000 residents within the City which is the maximum dedication requirement of the state Subdivision Map Act. The plan promotes diverse parks and recreational facilities to cater to different local population needs, encouraging voluntarism to enhance recreational programs. Collaboration with local school districts is sought to provide recreational opportunities using school and park facilities.

The Element intends to maintain a budgetary reserve equivalent to one-half of the City's estimated annual sales tax revenue. Implementation measures include requiring residential developers to provide parkland or in-lieu fees to meet the parkland standard, financing public infrastructure improvements through development projects, offering local facilities for recreational programs, creating a committee to advise the City Council on parks and recreation, and exploring user fees as a financing mechanism for public services and facilities. The implementation measures for Public Services and Facilities, Parks and Recreation include several key actions. These measures entail mandating residential developers to allocate land or provide in-lieu fees to uphold the City's parkland standard of five acres per 1,000 residents. Additionally, development project applicants would be required to fund necessary public infrastructure improvements resulting from project approval. The commitment to community engagement is emphasized through the continued accessibility of local facilities for recreational programs. A volunteer committee will be reinstated to contribute input on parks and recreation matters to the City Council.

Willits Municipal Code

The Willits Subdivision Regulations Section 16.36.060 on Open Spaces – Special Features empowers the planning commission to recommend the approval of subdivision plans that utilize clustered development to preserve open spaces and include special features such as airports, golf courses, and recreational facilities for the common use of owners and guests. Open space in this context is private open space that is typically provided with mulitfamily developments, and these features must adhere to zoning, lot area, and density standards on an averaged overall lots plus open space basis, and other legal provisions. The commission must ensure proper construction of the special features and plan for the maintenance and operation of open spaces and facilities, possibly requiring bonds or guarantees of compliance. Division plans may be approved under existing "P-D" zoning or be subject to "P-D" zoning or other appropriate zoning as a condition for approval.

The Subdivision Regulations also contains Section 16.24.140, Dedications and fees, which specifies that the planning commission may require that sites be dedicated or reserved, or fees be paid in lieu of such dedication or reservation, for parks and recreation areas, as permitted or required by the Subdivision Map Act.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, impacts related to recreation from implementation of the project would be significant if it would:

1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated;
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Park and recreational facility assessment involved a review of data available on City population and the NCRP park classification. An adverse effect would occur if a proposed development would have an impact on park and recreational facilities maintenance and their ability to adequately serve the local population.

PROJECT IMPACTS AND MITIGATION

Threshold REC-01: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Impact REC-01: Development facilitated by the project would result in an increase in housing and population, which would increase the use of existing parks and recreational facilities. Existing General Plan's Public Services and Facilities, Parks and Recreation Element and proposed policies of the Land Use Element Amendment requires that the parklands to residents ratio standard be maintained limiting the potential for parks physical deterioration, therefore expected physical impacts on recreational facilities through deterioration or accelerated deterioration due to the project would be ***less than significant.***

Existing park and recreational facilities for the City of Willits exceeds parklands to residents ratio standards of the City's Public Services and Facilities, Parks and Recreation Element (Willits General Plan Policy 6.240). Within City boundaries, around 80 percent is within the standard neighborhood park service area and a little less than 75 percent of the City is within the community park service area. The proposed sphere of influence and land use change areas on Baechtel Road and both sides of State Route 20 between the two Baechtel Road intersections is outside of the community and neighborhood park service area for existing City of Willits parks. This area and the nearby surrounding area have been identified for potential development of additional parks. A brief description of existing park resources that meet NRPA standards is shown in the table below.

Table 3.16c: Willits Parks Coverage Based on NRPA Standards

Park Classification	Service Area	Population Served	Acres per 1,000 Residents
Community Park (18.99 acres)	1.5 Mile Radius 5.0–8.0 acres / 1,000 residents	3,567	5.32 acres per 1,000
Neighborhood Park (3.74 acres)	One Neighborhood 1/2 Mile Radius (applied to "Bud" Snider Park) - Or - 1/4 Mile Radius (applied to all other) 1.0–2.0 acres / 1,000 residents	3,946	0.95 acres per 1,000
Community, Neighborhood, and Special Use Parks (22.72 acres)	City of Willits	4,920	4.16 acres per 1,000

Within the Proposed Sphere of Influence Areas (SOIs), there are currently no dedicated park or recreation facilities. However, the Mendocino Redwoods RV Resort, a private campground with cabins, is located within the West State Route 20 portion of the Proposed SOI. Portions of the Proposed SOI fall within the community and neighborhood park service areas, identified above, associated with the City of Willits Parks. The East Valley Street is partly within the neighborhood park service area and fully within the community park service area as is the Poplar Avenue and Furlong Road portion of the Locust Street portion of the Proposed SOI.

The closest City park to the Locust Street portion of the Proposed SOI is Babcock Park, which offers amenities like benches, a lawn area, and a fountain, though it lacks active recreation facilities. Additionally, just north of this area is Baechtel Grove Middle School, Blosser Lane Elementary School, and the Willits Kids Club, which provide fields and play areas. However, these spaces are primarily intended for school and club use and are not maintained as public parks. The East Valley Street portion of the Proposed SOI is directly adjacent to Recreation Grove Park and the Rodeo Grounds.

The existing General Plan Public Services and Facilities, Parks and Recreation Element and proposed Land Use Element contain a series of policies and implementation programs intended to ensure that the

City's ratio of parkland to population is maintained, that facilities are maintained, and services improved. Relevant policies and implementations are listed below.

> Existing General Plan Policies and Implementation Programs relating to Parks and Recreation:
> 6.210 Ensure that development occurs in a manner which is consistent with the ability of local public agencies to provide adequate services and facilities within an efficient cost framework.
> 6.230 Endeavor to more equitably distribute parks and recreational facilities throughout Willits.
> 6.240 Establish and maintain a minimum standard of five acres of parkland per 1,000 residents within the City limits.
> *6.310 Require residential developers to set aside lands or provide in-lieu fees to ensure that the City's parkland standard of five acres per 1,000 residents is maintained.*
> *6.320 Require applicants for development projects to finance public infrastructure improvements which would be necessitated by project approval.*
> 6.250 Promote a diverse range of parks, recreational facilities and programs to meet the needs of various components of the local population.
> 6.260 Promote voluntarism as a means of increasing the quantity and quality of local recreational programs.
> 6.270 Continue to cooperate with local school districts to provide opportunities for recreational use of school and park facilities.

The proposed General Plan Land Use Element plans for a maximum buildout of 7,500 residents, which would mean 2,580 additional residents using existing parks and recreational facilities. The Land Use Element Update contains a series of policies and implementation programs intended to ensure that the City does not facilitate development that would increase the use of park infrastructure that would result in physical deterioration of these facilities. Policy LU-3.11, Parks and Recreation, seeks to equitably expand opportunities for trails, parks, and recreational facilities throughout Willits and support the role of the City of Willits as a regional parks provider and consider evaluating the feasibility of establishing a recreation and parks district that extends beyond City boundaries to finance facilities that support the region that may be provided by the City.

Implementation Measure LU-3A, Park Enhancement, calls for the preparation and implementation of a public spaces, parks, and recreation strategic plan that addresses the need for new and improved community parks in the City, especially within disadvantaged communities; includes master planning for important park properties; and incorporates a funding strategy to establish ongoing revenue sources.

The timing, intensity, and location of potential new residential development within the City allowed by the General Plan is not known, nor is the proximity of such development to parks. In general, significant environmental affects would occur if population growth and park use outpace the improvements to parks and recreation facilities resulting in the deterioration of existing facilities. If park and recreation facilities are not developed at a rate commensurate with population growth, the proposed Land Use Element Update could result in overuse and deterioration of existing parks and recreation facilities.

Implementation of the policies and programs contained in the existing General Plan Public Services and Facilities, Parks and Recreation Element and the Land Use Element Amendment would reduce the potential for the deterioration of existing parks and recreation facilities. Most notably, policies in the General Plan's Public Services and Facilities, Parks and Recreation Element requires that the parklands to residents ratio standard be maintained, that the applicant of any proposed development project to fund necessary public infrastructure improvements resulting from project approval including that of recreational facilities, and the Land Use Element Amendment includes a program (LU-3C) requiring that

a public spaces, parks, and recreation strategic plan be prepared that addresses parks needs and access to parks and establishes a parks funding strategy including fees, grants, and partnerships. For this reason, the expected impact on recreational facilities through physical deterioration or accelerated physical deterioration is less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold REC-02: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact REC-02: Development facilitated by the project would result in housing and population growth, which could reduce the city's parkland to population ratio. However, the General Plan requires residential developers to set aside lands or provide in-lieu fees and the Land Use Element Update would implement strategic planning to ensure that the City's parkland standard of five acres per 1,000 residents is maintained. Future park development by the City or developers would be subject to CEQA review. Therefore, impacts to the physical environment associated with the project due to park facilities construction or expansion would be less than significant.

Implementation of the Land Use Element Update could facilitate population growth that would require the construction or expansion of recreational facilities which could have an adverse physical effect on the environment. The City of Willits currently has a ratio of 5.11 acres per 1,000 residents , given the 24.81. acres Community, Neighborhood, and Special Use Park Resources and a current population of 4,858. The City also has a General Plan standard to establish and maintain a minimum standard of five acres of parkland per 1,000 residents within the City limits.

This analysis evaluates the potential parks related environmental impacts of the projected City of Willits projected buildout population of 7,500 residents. A potential population growth of 7,500 indicates an additional 2,580 residents for existing parks and recreational facilities which would reduce the ratio of parkland acres per 1,000 residents without the creation of additional parks and associated recreational facilities as required by the City's Public Services and Facilities, Parks and Recreation Element. Without the development of additional park or recreational facilities, the parkland ratio would be 3.31 acres per 1,000 people. To maintain the City's current parks service ratio, 13.52 additional acres of parkland would need to be developed by applicants, as part of a subdivision, or the City.

The existing General Plan contains policies that require that adverse environmental impacts of proposed projects be identified and acceptably mitigated prior to approval and that environmental mitigation measures are included as conditions of project approval. The following additional policies and implementation programs existing General Plan are intended to lessen environmental impacts associated with new or expanded parks and recreation facilities triggered by the Land Use Element Update:

2.230 enhance the availability and accessibility of alternative modes of transportation and to incorporate transit facilities such as bus shelters and park and ride lots into the design of public development projects.

2.340 designate a network of bicycle routes providing safe passage throughout the City.

3.210 conserve existing natural resources, with particular emphasis on air and water quality, open space, tree preservation and riparian habitat maintenance.

3.230 requires that environmental mitigation measures included as conditions of project approval are effectively implemented and maintained over the long term.

4.333 require the use appropriate techniques to minimize pollution from construction activities.

4.736 no net loss of wetlands.

4.834 preserve trees and other significant visual features.

4.932 review by the California Archaeological Inventory (CAI) shall be required for development projects in potentially significant areas shown on the Historical and Archaeological Resources Map.

4.210 maintain ambient noise levels of 55 dBA (CNEL) in existing residential areas.

4.250 noise from all sources should be maintained at levels that will not adversely affect adjacent properties or the community.

4.260 noise from construction or required services should be permitted for the shortest duration possible and limited to time periods that will have the least possible adverse effect on surrounding land uses.

7.250 require geologic, seismic and soil analyses and acceptable mitigation of potential impacts for projects proposed within the Alquist Priolo seismic study zone.

7.280 ensure that all new construction is built to established minimum standards with respect to seismic safety.

7.350 Consider fire, flooding, geologic and seismic safety risks in reviewing proposals for development.

It is anticipated that future development facilitated by the project would result in an increase in residents and visitors that would also increase the need for services from park infrastructure. General Plan policy 6.310 requires residential developers to set aside lands or provide in-lieu fees to ensure the City's parkland standard of five acres per 1,000 residents is maintained and the City seeks to meet the needs for community parks in the City, especially within disadvantaged communities. Policies of the Circulation Element seek to increase the availability of non-vehicular modes of travel and reduce vehicle trips. Conservation and Open Space policies seek to conserve natural resources, including tree preservation and riparian habitat maintenance with no net impact to wetlands, as well as review for impacts to historic and archeological resources and require mitigation measures. Noise standards would apply to construction activities and to park operations. Safety policies are intended to consider fire, flooding, geologic and seismic safety risks.

The timing, intensity, and location of potential new facilities needed to maintain the City's parks to population ratio is not known nor does the project specifically involve the development of City park facilities. While park and recreation projects are commonly located within and near neighborhoods and existing facilities, they could also be located in entirely new areas. Given the location of existing City of Willits parks, new park and recreation facilities will likely be located in areas with existing services, such as water and wastewater, and areas that are adequately served by roads or transit. The acreage for new park or recreation facility could also vary, with as small as 10,000 to 20,000 square feet (e.g., a tot lot, basketball court, or recreation building) and others spanning several acres (e.g., ball fields). As a result, the construction of these new or expanded facilities could result potential adverse physical effects on the environment.

However, the nature and location of potential new or expanded park and recreation facilities needed to maintain City park service ratios is not known. In the event that new or expanded facilities are required as part of a subdivision or other permit pursuant to the City General Plan, Subdivision and Zoning Regulations, the City would address environmental impacts through project-specific CEQA review. If the development of new or expanded park and recreation facilities is initiated by the City, the City's action to carry out the project would require General Plan conformance review pursuant to Government Code Section 65402 and be subject to project-specific CEQA review. The City General Plan and CEQA require that potential significant environmental effects be identified and that feasible mitigation measures be included as conditions of project approval and effectively implemented and maintained over the long term. Consequently, with the implementation of existing General Plan policy the proposed new Land Use Element policy, impacts relating to the need for new or expanded parks and recreation facilities triggered by the Land Use Element would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

References

County of Mendocino. (2023). *Title 14 - RECREATION AND PUBLIC LANDS*. Retrieved from Municode Library: https://library.municode.com/ca/mendocino_county/codes/code_of_ordinances

GHD. (2022). *Willits Rail with Trail Project Initial Study/Mitigated Negative Declaration.*

Mendocino LAFCo. (2019). *City of Willits Municipal Service Review and Sphere of Influence Update.*

3.17 TRANSPORTATION AND CIRCULATION

This chapter describes the potential transportation impacts of the City of Willits General Plan Land Use Element and Sphere of Influence Updates (Project). The chapter is organized as follows.

- Environmental setting
- Regulatory setting
- Impact Analysis

The environmental setting describes the baseline conditions for the transportation system in the City of Willits (City) while the regulatory setting describes the laws and regulations that govern how transportation impacts are determined for the proposed Project. The impact analysis addresses the project's effects on vehicle miles traveled (VMT), transit, bicycle and pedestrian circulation, and safety.

The primary sources used to prepare this section include:

- City of Willits General Plan (1992)
- Bicycles and Pedestrian Specific Plan (2009)
- Mendocino County Regional Transportation Plan & Active Transportation Plan (2022)

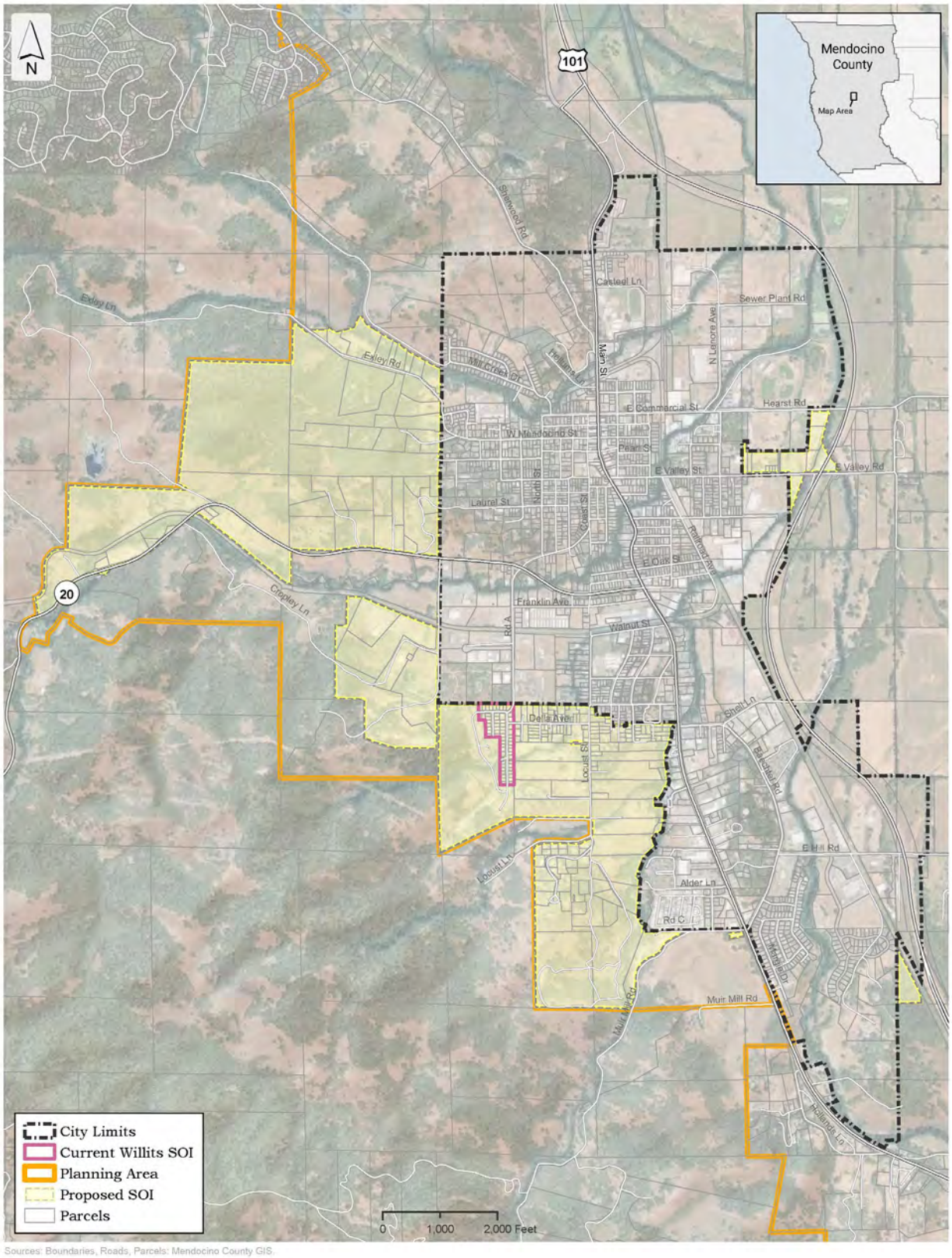
ENVIRONMENTAL SETTING

The City's transportation system includes roadways, bicycle and pedestrian facilities, and public transit service and facilities. The setting represents the physical and relevant operational transportation conditions under 2023 baseline conditions except for VMT. The VMT estimates contained in this analysis were obtained from the VMT+ web tool and represent 2019 conditions.[1]

PROJECT STUDY AREA

The City of Willits Land Use Element Project Area is shown in Figure 3.17a. The city is one of four incorporated municipalities in Mendocino County. The city's incorporated area consists of a 2.82-square-mile area and the City has an approximately 12.2-acre Shere of Influence (SOI) and the project would add approximately 1.44 square miles, equating to about 933.3 acres, to the City's SOI. State Route (SR) 20 and US 101 are the main highways that connect the city to other parts of northern California.

Figure 3.17a City Project Area (City and SOI)



ROADWAY SYSTEM

This section describes the physical characteristics of the city's roadway network. Figure 3.17b shows the functional classifications of the roadway network. These consist of state highways including SR 20 and US 101 plus city arterials, collectors, and local streets as noted in Table 3.17a below.

3.17a Functional Classification of the Roadway Network

Arterials	Collectors	Local Streets
Arterials are intended to move large volumes of traffic, and to serve motor vehicles, bicycles, and pedestrians. 4-Lane Arterials • S Main Street 2-Lane Arterials • SR 20 • N Main Street/Redwood Hwy • W Commercial Street	Collectors are intended to direct traffic from local roadways and carry it to arterials, highways, and freeways. Collectors typically have one lane of traffic in each direction. • Sherwood Road • North Street • School Street • Humboldt Street • Mill Street • Baechtel Road • Railroad Avenue • Blosser Lane / Coast Street • E Commercial Street • W Mendocino Avenue • Pine Street • E Valley Street • Franklin Avenue • Walnut Street • Locust Street • Della Avenue • Holly Street • E Hill Road	Local streets typically carry less than 5,000 vehicles per day. Speed limits on local roadways are set at 25 miles per hour.
Source: Caltrans, California Road Systems – Functional Classification, 2023		

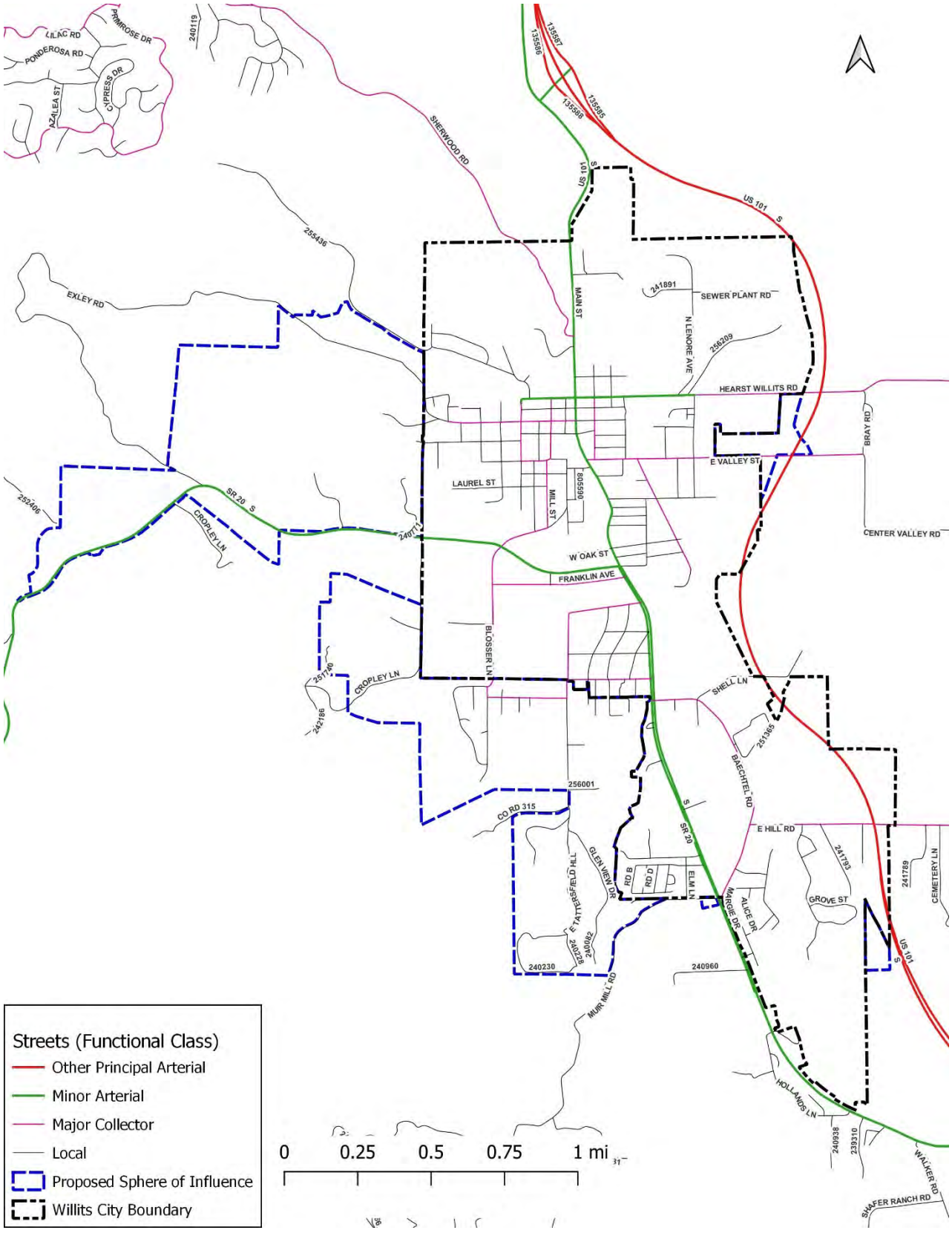
U.S. 101 is a north-south United States numbered highway that traverses the western region of the state of California and through the eastern edge of the city of Willits. US 101 is classified as a principal arterial, and it is the only main road that connects the city to other towns to the north and the south of the state. US 101 provides access to the city from the north through the N Main Street interchange. At the northern part of the City US 101 consists of two single lanes going each direction. US 101 provides access to the city from the south through the SR 20 interchange. At the southern part of the City US 101 consists of four lanes with two lanes going each direction.

SR 20 is an arterial that connects the city of Willits to US 101 to the south and US 1 to the west. SR 20 starts at the south of the city as a two-lane conventional highway with at-grade intersections. As it moves north toward the City SR 20 becomes four-lanes and eventually becomes S Main Street.

South Main Street is a two-lane arterial road that runs north to south through the city and downtown area. A class II bike lane and pedestrian facilities are present on both sides of the road. S Main Street eventually becomes N Main Street / Redwood Highway connecting the city to US 101 to the north.

Commercial Street is a two-lane arterial that runs from west to east and intersects Main Street. Pedestrian facilities and a class II bike lane are present on both sides of the road.

Figure 3.17b City of Willits Roadway Network



VMT

To evaluate potential project impacts on VMT, the VMT metrics described in Table 3.17b are evaluated and compared against baseline conditions.

Table 3.17b: VMT Metric Definition and Visualization

Metric	Definition	Visualization
Home-based VMT per resident	All home-based automobile vehicle trips are traced back to the residence of the trip-maker; non-home-based trips are excluded.	
Home-based work VMT per employee	All automobile trips between home and work are counted. (A variant might also count work-based other trips.)	

Source: Fehr & Peers

These metrics generally involve the tracing or accounting of vehicle trips and their length within a specific study boundary or from a specific trip generation source such as the project site. For this analysis, two sources were evaluated for providing VMT estimates for baseline conditions. The first source was the MCOG Travel Demand Forecasting Model.[2] The second source was the VMT+ tool developed by Fehr & Peers using VMT estimates derived from StreetLight mobile device data.[3] The MCOG model was last calibrated and validated for 2009 conditions raising questions about its applicability for 2023 or baseline conditions given the amount of time that has lapsed and the major changes or disruptions in travel that occurred due to the 2008-09 recession, the opening of the US-101 bypass, and COVID-19 pandemic. The MCOG model also does not produce home-based work VMT per employee without substantial modification of the model. The VMT+ estimates are derived from 2019 data. This is a pre-pandemic condition but much closer in time to 2023.

Table 3.17c contains estimates for each VMT metric above from both sources and is followed by a discussion of which VMT estimating source was selected for this analysis.

[2] https://www.mendocinocog.org/files/f49cda98a/2010+MCOG+Travel+Model-Devt+Report.pdf
[3] https://storymaps.arcgis.com/stories/e9fb17d33a2c4d60a6747071be3d5b4a

Table 3.17c: City of Willits VMT Estimates and Sources for Baseline Conditions

VMT Metric	MCOG Model (2009 Conditions)	VMT+ (2019 Conditions)
Home-based VMT per resident	8.7	22.8
Home-based work VMT per employee	Not Available	10.0

Source: MCOG Travel Demand Model (2010)

Prior to the availability of the VMT+ data, the MCOG model was the best available model for estimating and forecasting local VMT. As noted above, the model has important limitations and does not produce all the relevant VMT metrics desired for this impact analysis. As such, the VMT+ estimates are used to describe baseline conditions and will be the benchmark for the impact analysis.

Existing Public transit service and facilities

The public transit service in Willits is operated by the Mendocino Transit Authority (MTA) and includes the following services:

- Route 1 Local service within Willits.
- Route 20 Connects Willits, Mendocino Community College, and Ukiah.
- Route 65 CC Rider regional route.

Route 1 is a local route with a northbound and southbound service in the city of Willits. Northbound starts at the Howard Hospital Campus at 7:38 AM and ends at the Integrated Service Center. Southbound starts at Creekside Drive at 7:12 AM and ends at the Howard Hospital Campus. Transit service is scheduled on an hourly basis Monday through Friday. There is no weekend service available. Route 20 connects the city of Willits to the city of Ukiah to the south. Southbound starts at the Integrated Service Center in Willits at 6:41 AM and ends Mendocino College campus in Ukiah. Northbound starts at Mendocino College campus in Ukiah at 8:30 AM. Transit service is scheduled on various frequencies ranging from 49 minutes to 100 minutes Monday through Friday. No weekend service is available. Route 65 runs 7 days per week except for Thanksgiving and Christmas Day from Ft. Bragg to Willits, Ukiah, and Santa Rosa. Transit service runs 4 times daily from Monday through Saturday starting at 8:30 AM and the last bus at 6:07 PM going northbound. There is only 1 bus service on Sundays with southbound at 8:30 AM and northbound at 4:09 PM.

Willits has one Greyhound Bus[2] station located at 1488 S Main Street. The station is open 24 hours Monday through Sunday. The Willits Amtrak[3] offers an unstaffed, curbside bus stop at the Skunk Train parking lot on 298 E Commercial Street. Table 3.17d shows the transit service schedule in Willits.

Table 3.17d MTA Transit Service

Route	Weekday		Sunday	
	Freq. (min)	Span	Freq. (min)	Span
Route 1	60	7:12AM - 6:33 PM	n/a	n/a
Route 20	49-140	6:41AM – 6:35PM	n/a	n/a
Route 65	80 – 210	8:30 AM – 6:07 PM[1]	once	8:30 AM – 4:09 PM

Source: Mendocino Transit Authority, 2023

[1] Route 65 Operates Monday through Saturday schedule.

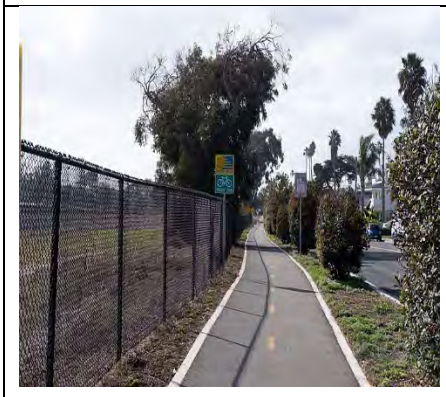
[2]Willits Greyhound

[3]Willits Amtrak

BICYCLE FACILITIES

Figure 3.17c describes the bicycle facility types and locations in Willits. While the City of Willits Bicycle and Pedestrian Specific Plan identifies a city-wide system of class II and class III bikeways, limited facilities exist. Completing the system is planned to occur over time as funding and development opportunities present themselves.

Figure 3.17c Existing Bicycle Facility Types and Locations in Willits

Class I "Bike Paths"	
	Class I facilities, commonly referred to as bike paths, are facilities separated from automobile traffic and often designed to accommodate other modes of transportation, including pedestrians and equestrians, in which case they are referred to as shared or multi-use paths. The Willits Rail with Trail Project, a 1.6-mile class I facility within the Great Redwood Trail Agency (GRTA) right of way between E Commercial Street to E Hill Road is proposed to start construction in November 2023.

Class II "Bike Lanes"	
 Source: Google Maps – accessed 8.31.23	Class II facilities, commonly referred to as bike lanes, are dedicated facilities for bicyclists immediately adjacent to automobile traffic. Class II facilities are identified with striping, pavement markings and signage. Class II bike lanes are located at the following locations: • N Main Street/Redwood Highway • W Commercial Street/E Commercial Street • Baechtel Road
Class III "Bike Routes"	
	Class III facilities, commonly referred to as bike routes, are on-street routes where bicyclists and automobiles share the road. They are identified with pavement markings and signage and are typically assigned to low-volume and/or low-speed streets. A class III bike route is located on SR 20 between Blosser Lane and S Main Street.

PEDESTRIAN FACILITIES

Pedestrian facilities include a variety of public infrastructure to accommodate and promote walking. Sidewalks and trails are the general features that facilitate walking to destinations while amenities, such as benches, pedestrian-scaled lighting, shade trees, protected crossing, and transparent store frontages help create comfortable and enjoyable walking environment. Some of these features exist in Willits but are generally concentrated in the downtown, especially along Main Street.

The Willits Main Street Corridor Enhancement Plan has enhanced Main Street into a walkable and bicycle-friendly corridor with trees, green streets concepts, and traffic calming measures along a three–mile stretch. Sidewalks are included along the major streets in Downtown Willits. Beyond downtown, sidewalks are present in some neighborhoods, but gaps exist. The project description notes that 6.4 miles of streets in the city lack sidewalks while approximately 23.4 miles have sidewalks. According to the *Willits Safe Routes to School Action Plan*, Safe Routes to School National Partnership and Berkeley SafeTrec, 2017, community concerns have arisen over the lack of safe infrastructure for walking around schools and conflicts with cars along major roads.

REGULATORY SETTING

FEDERAL

No federal plans, policies, regulations, or laws related to transportation and circulation apply to the analysis of project transportation impacts.

STATE

Senate Bill 743

SB 743, passed in 2013, required the Governor's Office of Planning and Research (OPR) to develop new State CEQA guidelines that address transportation impact metrics under CEQA. On December 28, 2018, the CEQA Guidelines were amended to add Section 15064.3 determining the Significance of Transportation Impacts, which states that generally, VMT is the most appropriate measure of transportation impacts. In addition to making VMT the preferred metric, Section15064.3(a) also prohibited the use of delay from being used to determine environmental impacts stating, "Except as provided in subdivision (b)(2) (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact." This prohibition is reinforced by the CEQA Statute 21099(b)(2), "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any." Beginning on July 1, 2020, the provisions of 15064.3 and 21099 applied statewide.

Technical Advisory on Evaluating Transportation Impacts in CEQA

The Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) (Governor's Office of Planning and Research, December 2018) provides advice and recommendations to CEQA lead agencies on how to implement SB 743. This includes technical recommendations regarding the assessment of VMT, thresholds of significance, VMT mitigation measures, and screening thresholds for certain land use projects. Lead agencies may consider and use these recommendations at their discretion.

The Technical Advisory also provides guidance on impacts on transit. Specifically, the Technical Advisory suggests that lead agencies generally should not treat the addition of new transit users as an adverse impact. As an example, the Technical Advisory suggests that "an infill development may add riders to transit systems and the additional boarding and alighting may slow transit vehicles, but it also adds destinations, improving proximity and accessibility. Such development also improves regional vehicle flow by adding less vehicle travel onto the regional network."

On December 18, 2019, California's Third District Court of Appeal published an opinion in Citizens for Positive Growth & Preservation v. City of Sacramento, which involved a challenge to the City of Sacramento's adoption of its General Plan based on LOS instead of VMT for transportation impact identification. In reaching its decision in that case, the Court of Appeal applied Public Resource Code section 21099(b)(2) and stated, "existing law is that 'automobile delay, as described solely by level of service, or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment under CEQA, except for roadway capacity projects.'" The Court therefore concluded that the General Plan's policies that included LOS standards could not be used as a threshold to determine whether the project would have a significant environmental impact under CEQA. VMT is used to identify the project's potentially significant transportation impacts for the purposes of this EIR.

Vehicle Miles Traveled-Focused Transportation Impact Study Guide

The Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG) (Caltrans, May 20, 2020) provides directions to lead agencies regarding compliance with SB 743 from Caltrans' perspective. The TISG replaces the Caltrans' 2002 Guide for the Preparation of Traffic Impact Studies and is for use with

local land use projects. The TISG largely endorses the OPR Technical Advisory for VMT impact analysis and includes the following objectives.

- Guidance in determining when a lead agency for a land use project or plan should analyze possible impacts to the state highway system (SHS), including its users.
- Guidance for Caltrans land use review that supports state land use goals, state planning priorities, and GHG emission reduction goals.
- Statewide consistency in identifying land use projects' possible transportation impacts, to the SHS, and to identify potential non-capacity increasing mitigation measures.
- Recommendations for early coordination during the planning phase of a land use project to reduce the time, cost, and/or frequency of preparing a Transportation Impact Study or other indicated analysis.

Interim Local Development and Intergovernmental Review Safety Review Practitioners Guide

The Interim Local Development and Intergovernmental Review (LDIGR) Safety Review Practitioners Guide (Caltrans, December 2020) provides guidance to Caltrans districts and lead agencies for analyzing safety impacts of projects on the state highway system (SHS). A proposed land use project or plan may affect the SHS by adding new automobile, bicycle, or pedestrian trips to state roadways; modifying access to state roadways; or affecting the safety of connections to or travel on state roadways. Caltrans is responsible for reviewing these projects and identifying opportunities for projects to contribute to safety improvements, where justified.

REGIONAL REGULATIONS

2022 Mendocino County Regional Transportation Plan & Active Transportation Plan

The Mendocino Council of Governments (MCOG) is the regional transportation planning agency for the region, which includes Mendocino County and the cities of Fort Bragg, Point Arena, Ukiah, and Willits and is responsible for the preparation of, and updates to, the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP). They also prepare other related transportation plans including the county's Active Transportation Plan (ATP).

The RTP reflects the population and employment growth anticipated by local governments and includes a financially constrained list of transportation improvement projects to serve existing and future populations. Therefore, RTP performance is influenced by VMT growth so new land use plans that are not consistent with the RTP may require modifications to future updates.

LOCAL REGULATIONS

City of Willits General Plan Vision 2020 (1992)

The City of Willits General Plan provides long-range directions and policies for the use of land within the city. The Circulation Element of the General Plan provides the framework for achieving the city's transportation system goals. The Circulation Element outlines the goals and policies necessary for the city to achieve its vision of a multimodal transportation network that accommodates vehicles, transit, bicycles, and pedestrians. For the purposes of this EIR, the goals and policies of this document were used in evaluating potential transportation impacts of the proposed project.

The following measures were adopted:

2.230 Enhance the availability and accessibility of alternative modes of transportation, such as walking, bicycling, carpools, and buses. Incorporate mass transit facilities such as bus shelters and park and ride lots into the design of public and private development projects.

2.260 Accomplish a 25 percent reduction in single occupancy vehicle trips by 2000.

2.340 Designate a network of bicycle routes providing safe passage throughout the City; establish linkages between schools and the designated bikeway.

4.236 Bicycle and pedestrian pathways which connect to the City's existing circulation network should require components of any approved residential planned unit development project of 25 or more single family dwelling units.

4.237 Park and ride lots should be included in the design of residential subdivisions or planned communities of 50 or more dwelling units.

City of Willits Bicycle and Pedestrian Specific Plan (2009)

The City of Willits Bicycle and Pedestrian Specific Plan was developed with the following goals in mind.

GOAL 1 **Improve safety and education**. To make the City's circulation system safer for all pedestrians and bicyclists, and enhance education for bicyclists, pedestrians, and motorists.

Policy 1.1-1 Expand and support school commute improvements for safety educational, marketing, and physical enhancements to increase safety on school commute routes for pedestrians and bicyclists.

Policy 1.1-2 Where possible, incorporate traffic calming techniques as described in published documents produced by organizations such as the Institute of Transportation Engineers (ITE), including measures to manage vehicle speeds and flows so as to maximize the safety of pedestrian and bicycle movement in residential and commercial neighborhood.

GOAL 2 **Provide greater access**. Plan, design, implement, and maintain a comprehensive bicycle and pedestrian system in Willits.

Policy 2.1-1 The City of Willits should develop and maintain a city-wide system of paths, lanes, and routes which meets the needs of commuter and recreational users, helps reduce motor vehicle trips, and links residential neighborhoods with employment centers and with local and regional destinations.

Policy 2.1-2 Integrate the Willits bicycle and pedestrian network of lanes, paths, and routes into the regional system, including direct and transit connections to Brooktrails, Fort Bragg, and Ukiah.

Policy 2.1-3 The City of Willits should explore the use of active and abandoned railroad and other natural and manmade corridors for the development of Class I bicycle and pedestrian pathways that connect major employment centers, shopping and recreation areas, and transit modes.

GOAL 3 **Maintain and promote a high quality of life.** Foster a sustainable environment by increasing transportation options such as bicycling and walking, recognizing that

increased use of these methods of travel and the reduced use of automobiles are an essential component of a sustainable local and regional environment.

Policy 3.1-4 All new residential, commercial, and industrial development in Willits should incorporate aesthetically pleasing bicycle and pedestrian friendly design elements, both on and off the road system.

GOAL 4 ***Establish and effective implementation strategy.*** Make bicycle and pedestrian improvements a high priority when allocating funding, reviewing development plans, and coordinating interagency and inter-jurisdictional transportation improvement efforts.

IMPACT ANALYSIS

This section describes the methodology and standards of significance utilized to analyze and determine the proposed project's potential impacts related to transportation.

METHODOLOGY

The proposed project involves expanding the land use supply for mixed-use growth in the City of Willits along with modifications to the general plan goals and policies to support that growth in a sustainable form. Per the project description:

> *"The City is adding mixed-use land use designation to accommodate demand for housing and commercial development and to accommodate growth in areas served by existing infrastructure and services. Because City General Plan Land Use Designations alone cannot determine the preferences of individual property owners or their desired timing to develop their land, the City is proposing to expand its Sphere of Influence to plan additional land for potential future annexation. The City's intent is to plan this additional land for residential, industrial, and public facility development, increasing the available supply of residential lands in particular to increase the likelihood that interested developers can find willing landowners to build housing units to accommodate growth."*

This change is intended to increase opportunities for where and what type of growth can occur in the city without affecting the current general plan's expected buildout population of 7,500 persons.

Therefore, the project description was reviewed to determine how it would affect future travel demand and network supply in the city based on the methodology specified below.

- For the transit, bicycle and pedestrian, and safety components of the transportation system, the analysis focuses on whether the project would disrupt baseline facilities or services or interfere with the implementation of planned improvements.

- The safety evaluation considers whether the project's proposed modifications to these facilities are consistent with applicable design standards. This involves comparing the project description and any proposed modifications, if any, to the City of Willits design standards or Caltrans design standards. Design standards are used to provide common user expectations to drivers, bicyclists, and pedestrians to minimize the potential for collisions.

- The project's effect on VMT considers how the potential land use and policy changes of the proposed project will influence VMT per capita rates of the city.

SIGNIFICANCE THRESHOLDS

For the purposes of this EIR, adoption and implementation of the proposed project would result in significant impacts under CEQA, if any of the following would occur:

- Disrupt existing bicycle and pedestrian facilities or interfere with planned facilities or cause a physical change inconsistent with bicycle and pedestrian policies contained in the City of Willits General Plan and the City of Willits Bicycle and Pedestrian Specific Plan.
- Disrupt existing transit service, interfere with planned transit service, or cause a physical change inconsistent with transit policies contained in the City of Willits General Plan.
- Project modifications to the study area transportation network are not consistent with the applicable design standards.
- Generates home-based VMT per resident or home-based work VMT per employee at rates that are greater than the citywide average under baseline conditions.

The VMT threshold selected differs from recommendations contained in the state reference documents below.

- *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), California Governor's Office of Planning and Research (December 2018).
- *Vehicle Miles Traveled-Focused Transportation Impact Study Guide*, Caltrans, May 20, 2020
- *2022 Scoping Plan for Achieving Carbon Neutrality*, California Air Resources Board, December 2022.

The state agencies that developed these documents include significant ranges of VMT performance as part of VMT thresholds. For some project types such as retail land uses or new roadway capacity expansion projects, any increase in VMT would constitute a significant VMT impact. In other cases, land use projects could generate large increases in VMT without causing a significant impact if the project was located in a certain type of area such as being within ½ mile of a high-quality transit station. The rational for the state's thresholds tends to be connected to the state's greenhouse gas (GHG) reduction goals, which is one of the objectives of SB 743 as noted above. However, limited evidence is presented in these documents with respect to why different land use and transportation projects would have disparate treatments under the various threshold recommendations. One VMT has the same environmental consequences regardless of project type or location.

The city supports goals such as GHG reduction but balances them against other important objectives of the general plan. The City's general plan identifies locations for land use development and supporting transportation infrastructure based on local community values balancing various tradeoffs across economic development, environmental protection, housing affordability, and quality of life. The plan's future VMT therefore represents the amount of VMT increase that the city accepts under these tradeoff conditions.

PROJECT IMPACTS AND MITIGATION

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

VEHICLE MILES TRAVELED

Impact TRAN-01: The proposed project will contribute to lower VMT per capita rates resulting in a less than significant impact.

The City (and sphere of influence, together the Project Area) is planned to potentially expand by approximately 325 acres to create more opportunity sites for expected growth. The City will remain relatively compact with existing development and new growth concentrated in an area of approximately 2.5 by 3 miles where any vehicle trips generated will be relatively short in length compared to 9.5-mile average trip lengths for Mendocino County.[4] As a result, population and employment growth in this area would be expected to generate VMT per capita at rates similar to baseline conditions. Even lower rates are possible due to the proposed project's policy changes listed below that support infill and mixed-use growth plus improved active transportation conditions.

LU-2.2 Infill Development

Land within areas of the City served by utilities, transportation infrastructure, and municipal services represent the best opportunity to support affordable housing and employment development, and to reduce greenhouse emissions. Encourage incremental development of vacant and underutilized infill areas that are appropriately scaled and enhances existing neighborhoods within the City. *(Source: Existing Policy 1.230, modified)*

LU-3.1 Complete Streets

Consistent with Circulation Element Policies 2.230 and 2.260 that seek to enhance the accessibility walking, biking and reduce in single occupancy vehicle trips, design, construction, reconstruction, repair and maintenance efforts on the City's streets, bridges, pathways, and sidewalks, shall create a comprehensive, integrated transportation network that is safe, accessible, comfortable, accommodating, and welcoming to users of all ages, races, ethnicities, incomes, and physical abilities, and all modes of transportation, particularly those walking, biking, and using transit, and in doing so the City shall apply a Complete Streets framework in all applicable and feasible transportation projects to allow the safe, comfortable, convenient and accessible use of streets for all street users. (Source: New Policy)

LU-3.3 Mixed Use Areas

Encourage development that creates vibrant and walkable areas, reduces greenhouse gas emissions, and promotes economic development within downtown and neighborhood areas by implementing mixed use land use designations that support a range of commercial, office and residential uses; enable the flexible use of existing structures and vacant land; and ensure compatibility with adjacent land uses, particularly residential uses, through site, landscape, and building design features. (Source: New Policy)

LU-3.5 Promote a Healthy Community

Ensure that all residents have access to spaces, events, and programs that support physical activity, and encourage businesses and service providers to create a healthy food system, including local organic food production and community gardens, which supports all residents. *(Source: New Policy)*

[4] Estimate based on VMT+ tool 2022 estimates derived by Fehr & Peers.

LU-3.6 Consider Public Health in Land Use

When reviewing proposals for changes in land use and development, public health, welfare, and safety must be considered. *(Source: New Policy)*

LU-3.10 Greenhouse Gas Emission Reductions

Evaluate new larger-scale residential, commercial, and industrial projects for compliance with state regulations and require feasible mitigation measures to reduce greenhouse gas (GHG) emissions. *(Source: New Policy)*

LU-4.2 Main Street Mixed Use Land Use Designation

Apply the Main Street Mixed Use Land Use Designation to property that generally fronts along the Main Street core between Commercial Street and Oak Street and allow for a range of commercial, office and residential uses; enable the flexible use of existing commercial structures; encourage building design, sidewalk, plaza area, and street designs to slow traffic to provide a comfortable atmosphere for walking, biking, outdoor seating and gathering. *(Source: New Policy)*

LU-4.3 Adaptive Reuse of Commercial Structures

Enable the adaptive reuse and revitalization of existing commercial structures on Main Street by establishing flexible and appropriate lot standards, including reducing or eliminating on-site parking requirements. *(Source: New Policy)*

LU-4.4 Off-Street Parking

Consider implementing a “park once” program for Downtown, that includes provisions within the Main Street Mixed-Use area to reduce or eliminate parking mandates to lessen regulatory barriers to the reuse and revitalization of downtown buildings, and that implements the recommendations of the Downtown Specific Plan and the Willits Circulation and Parking Improvement Plan and provides for ongoing monitoring and management to balance the interests of all users. *(Source: New Policy)*

LU-4.6 Slowing Traffic

Continue to evaluate modifications to Main Street design to slow traffic to provide a comfortable atmosphere for outdoor seating and gathering, walking, and biking, while considering the needs for parking. *(Source: New Policy)*

LU-5.2 South Main Street Improvements

In cooperation with property owners and Caltrans, develop and implement street design standards, including lane configuration, coordinated landscaping, signage, street lighting, benches, wider sidewalks, safe crossings, and bike lanes, to enhance and beautify the streetscape and building frontages to support businesses and to provide a safer, and more enjoyable atmosphere for shopping, walking, biking, outdoor seating and gathering, consistent with any City Complete Streets policies. *(Source: New Policy)*

LU-6.5 Missing Middle Housing

Facilitate new “Missing Middle Housing” construction, defined as a mix of housing types including duplexes, triplexes, and fourplexes, in a manner consistent with Senate Bill 9 within areas appropriately zoned for single family residential uses and located within an Urban Cluster as defined by the U.S. Census. *(Source: New Policy)*

LU-6.6 Zoning Flexibility

Provide greater flexibility in the range of permitted and conditionally permitted uses in commercial and residential areas to allow residences on upper floors and behind shop fronts or consider establishing limited neighborhood commercial combining zone that may be applied to residential zones and includes a specific range of allowable uses, clear performance standards, and a variety of permitting pathways to allow needed commercial uses in close proximity within residential areas. *(Source: New Policy)*

LU-6.7 Support Home-Based Businesses

Review and update standards for home-based businesses, or home occupations to allow greater flexibility where such uses are compatible. Allow home-based businesses as principally permitted uses where all performance standards specified in the Zoning Regulations are met and a business license is secured. Allow for an increase in the scale and range of allowable home-based business types in residential zones where potential nuisances are addressed through the permit approval process. *(Source: New Policy)*

From a larger geographic perspective, attracting growth to this area instead of outlying unincorporated areas of the county could reduce future VMT growth in the region. Based on an evaluation of VMT per capita rates using the VMT+ tool, the unincorporated areas around Willits have home-based VMT per resident rates as high as 30 (baseline for Willits is 22.8) and home-based work VMT per employee rates over 50 (baseline for Willits is 10.0). Therefore, this impact is less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

BICYCLE FACILITIES

Impact TRAN-02: The proposed project will not interfere with existing bicycle facilities and the impact is less than significant.

The proposed Project does not propose transportation network modifications that would disrupt existing or interfere with planned bicycle facilities. The proposed project's land use and policy changes may generate demand for new bicycle trips. The city's compact form makes it highly accessible by both pedal and electric bicycles (e-bicycles). The policy changes below will contribute to improving the existing bicycle environment (see Impact TRAN-01 discussion for complete policy language).

LU-3.1 Complete Street
LU-3.5 Promote a Healthy Community
LU-3.6 Consider Public Health in Land Use
LU-3.10 Greenhouse Gas Emission Reductions
LU-4.6 Slowing Traffic
LU-5.2 South Main Street Improvements

The potential increase in bicycle trips could help the city find support for accelerating planned improvements identified in the City of Willits Bicycle and Pedestrian Specific Plan. Therefore, this impact is less than significant.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

PEDESTRIAN FACILITIES

Impact TRAN-03: The proposed project will not interfere with existing pedestrian facilities and the impact is less than significant.

The proposed project does not propose transportation network modifications that would disrupt existing or interfere with planned pedestrian facilities. The proposed project's land use and policy changes may generate demand for higher levels of walking. The policy changes below will contribute to improving the existing pedestrian environment (see Impact TRAN-01 discussion for complete policy language).

LU-3.1 Complete Street
LU-3.3 Mixed Use Areas
LU-3.5 Promote a Healthy Community
LU-3.6 Consider Public Health in Land Use
LU-3.10 Greenhouse Gas Emission Reductions
LU-4.2 Main Street Mixed Use Land Use Designation

LU-4.4 Off-Street Parking
LU-4.6 Slowing Traffic
LU-5.2 South Main Street Improvements

The potential for greater walking may accelerate the need for improvements identified in the City's General Plan and Bicycle and Pedestrian Specific Plan especially those that would close existing sidewalk gaps but would not interfere with any planned improvements. Therefore, this impact is less than significant.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

TRANSIT SERVICE & FACILITIES

Impact TRAN-04: The proposed project will not interfere with existing transit facilities and the impact is less than significant.

The proposed project does not propose transportation network modifications that would disrupt existing or interfere with planned transit facilities or services. As growth occurs within the proposed sphere of influence, new transit needs may emerge such as new stops along MTA Route 65. The Mendocino Council of Governments annually seeks public input and citizen participation to identify unmet transit needs in the region. Therefore, this impact is less than significant.

MITIGATION MEASURE

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

SAFETY

Impact TRAN-05: The proposed project will not cause an inconsistency with applicable design standards and the impact is less than significant.

The proposed project does not propose transportation network modifications directly, but they could occur in response to subsequent individual land use projects. As growth occurs and new land use projects advance, modifications to the local and state transportation networks may be required. Any modifications would be carried out consistent with the applicable Caltrans and City of Willits design standards. These design standards are intended to minimize conflicts and collisions by providing travelers with common

expectations for movement on the network. Modifications to existing networks are often opportunities to update facilities to the most current design standards, which consider all travel modes and users. Therefore, this impact is less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Cumulative Impacts

Impacts related to conflicts with transit, bicycle or pedestrian transportation, roadways, and safety would be identical to the impacts described in the project impacts section above; therefore, they are not repeated in the cumulative impacts' evaluation. For VMT, additional considerations may be warranted as explained below.

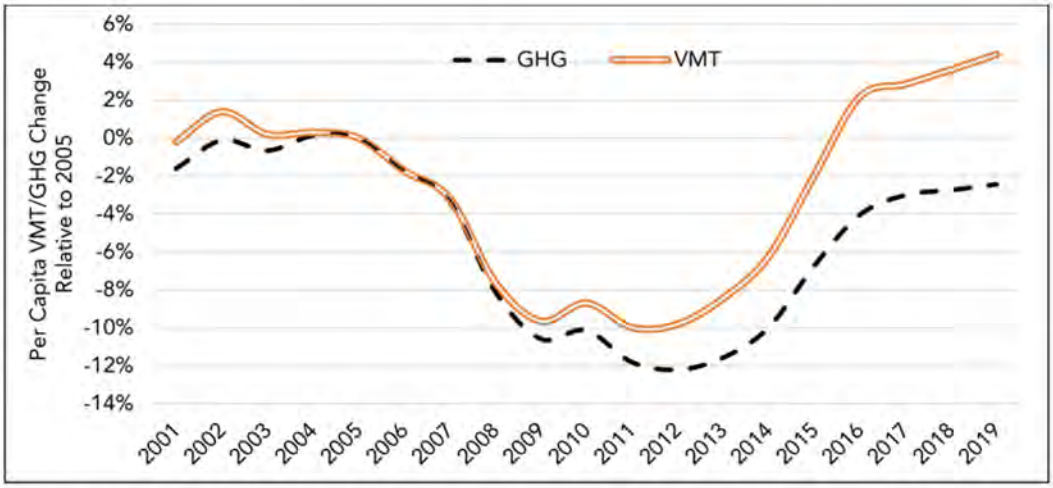
VMT

When making a final VMT impact determination, other available evidence related to VMT trends should be considered. This analysis identified the following relevant information.

- *2018 Progress Report, California's Sustainable Communities and Climate Protection Act* (2018 Progress Report) (California Air Resources Board, 2018).
- *2022 Progress Report, California's Sustainable Communities and Climate Protection Act* (2022 Progress Report) (California Air Resources Board, 2022).
- *California Air Resources Board Improved Program Measurement Would Help California Work More Strategically to Meet Its Climate Change Goals* (Audit Report) (Auditor of the State of California, 2021).
- *2022 Scoping Plan for Achieving Carbon Neutrality* (Scoping Plan) (California Air Resources Board, 2022).

The 2018 and 2022 Progress Reports measure the effect of SB 375, revealing that VMT and GHG per capita increased in California between 2010 and 2019 and are trending upward (Figure 3.17d).

Figure 3.17d Draft 2022 Progress Report, Light-Duty VMT and GHG Per Capita Relative to 2005 (California's 18 MPO Regions Aggregated)



Source: California Air Resources Board, 2023

The Audit Report is a recent assessment of CARB's GHG reduction programs, which also found that VMT and associated GHG emissions were trending upward through 2018. Per the audit, the state is not on track to achieve 2030 GHG reduction goals, and emissions from transportation have not been declining. The 2020 Mobile Source Strategy (California Air Resources Board 2021) also acknowledges the challenge of VMT reduction and states, "Without additional policy intervention, VMT may continue to rise."

The Scoping Plan reviews California's progress for meeting GHG reduction goals and sets forth strategies to achieve those goals based on past performance. The plan acknowledges that the state is not meeting its VMT reduction objectives and that VMT growth is returning after COVID-19 pandemic effects diminish.

After a significant pandemic-induced reduction in VMT during 2020, passenger VMT has steadily climbed back up and is now closing in on pre-pandemic levels. Driving alone with no passengers remains the primary mode of travel in California, amounting to 75 percent of the mode share for daily commute trips. Conversely, transit ridership, which was also heavily affected during the lockdown months, has not recovered at the same pace as VMT, and roughly averages two-thirds of pre-pandemic levels of ridership.[1]

This evidence demonstrates the challenge of reducing VMT when background macro-level conditions are contributing to higher VMT generation rates.

The evidence from these reports suggest additional actions by the state may be necessary to meet its VMT and GHG reduction goals. Doing so would alleviate the need for further actions by local agencies. To date, the state has not increased the cost of driving, made driving less convenient, or reduced the barriers or constraints that prevent more efficient use of vehicles and greater use of transit, walking, and bicycling. If the state takes these actions, the VMT forecasts contained in this analysis may be lower in

the future. Therefore, no change to the VMT impact determination is expected under cumulative conditions.

ANALYSIS LIMITATIONS – DISRUPTIVE TRANSPORTATION TRENDS

Transportation and mobility are being transformed through several forces ranging from new technologies, different personal preferences, and the unique effects of the COVID-19 pandemic, the combination of which could alter traditional travel demand relationships in the near term and long term. These disruptive trends increase uncertainty in forecasting future travel conditions and are not all fully represented in the MCOG travel demand model or VMT+ analysis tool used in this analysis. Information about how technology is affecting, and will affect travel, is accumulating over time.

Furthermore, the COVID-19 pandemic and subsequent actions by federal, state, and local governments to curtail mobility and encourage physical distancing (i.e., limit in-person economic and social interactions) may have long-term effects on travel demand especially transit and ridesharing. It is possible that some of these temporary changes will influence people's travel choices into the future, including either accelerating or diminishing some of the emerging trends in transportation that were already underway prior to the pandemic. Some of the emergent changes already influencing travel behavior that could accelerate in the future include the following.

1. Substituting internet shopping and home delivery for some shopping or meal-related travel.
2. Substituting participating on social media platforms for social/recreational travel.
3. Substituting telework for in-office work/commute travel.
4. Substituting telemedicine appointments for eligible in-person medical appointments.
5. Using new travel modes and choices. Transportation network companies such as Uber and Lyft, car sharing, e-bicycle/scooter sharing, and on-demand micro-transit services have increased the options available to travelers and have contributed to changes in traditional travel demand relationships.

These trends are not expected to change the transportation impact findings.

3.18 UTILITIES AND SERVICE SYSTEMS

This section describes the potential impacts to the utilities and service system associated with the Project. Specifically, water supply, wastewater, stormwater, solid waste, electricity, natural gas and telecommunications are each addressed in separate portions of this section. Other utilities and services are addressed in other chapters of this EIR. Specifically, drainage systems are considered in Section 3.11, Hydrology and Water Quality; hazardous waste disposal in Section 3.10, Hazards and Hazardous Materials; and schools, police, fire protection, and other public services in Section 3.16, Public Services. This section describes the regulatory framework and existing conditions, identifies criteria used to determine impact significance, provides an analysis of the potential utilities and service system impacts, and identifies proposed and existing policies in the Vision 2020 Willits General Plan Revision (General Plan) adopted in 1992 that could minimize potentially significant impacts.

ENVIRONMENTAL SETTING

MUNICIPAL WATER SOURCES

The City owns, operates, and maintains a public water system that includes surface water reservoirs, a groundwater well, a surface water treatment plant (WTP), a groundwater treatment plant (GWTP), and associated distribution infrastructure. This section describes the existing conditions of the water supply, treatment, and distribution system.

The primary potable water supply source for the City is surface water from the Centennial and Morris Reservoirs, with groundwater available as a back-up supply to be used in accordance with the City of Willits Groundwater Operational Use Plan (adopted 2022). These sources are described in further detail below. The City's water supply sources and water treatment plants, along with other public water purveyors in the surrounding area are shown on Figure 2-1 of the Land Use Element Update Existing Conditions Report prepared by LACO Associates (LACO) in April 2023 (see Figure 3.18a).

Surface Water

The City historically obtained its entire potable water supply from surface water sources: the Centennial and Morris Reservoirs, both fed by Davis Creek. According to bathymetric surveys completed by the City in 2012, the Centennial Reservoir has a storage capacity of approximately 638 acre-feet (AF) and the Morris Reservoir has a storage capacity of approximately 662 AF, for a total of approximately 1,300 AF of surface reservoir storage. Due to limited storage capacity in these reservoirs, the system was (and largely still is) reliant on late rain in regions south of the City to keep reserves full late enough in the year that they will not be exhausted (LACO 2019). Additionally, water availability in these reservoirs is contingent on numerous factors, including but not limited to: losses to evapotranspiration; useable storage (when considering that when the volume of the reservoirs is depleted in the summer and fall months, the water warms, the amount of organic material present in the reservoirs increases, and it can be more difficult to treat); and release requirements for normal and drought years that are mandated by the City's water rights. The Existing Conditions Report notes that an in-depth evaluation of these factors was outside the scope of the analysis; however, consideration of these factors is important to understanding the various constraints on the City's water supply system (LACO 2023a).

As provided in Table 3.18-1, below, from 2019 to 2022, the City produced an average of approximately 22.5 million gallons per month (MGM), for a total of approximately 270.5 million gallons (MG) per year, from surface water sources (Communications with City Staff 2023).

Figure 3.18a Water Sources and Providers

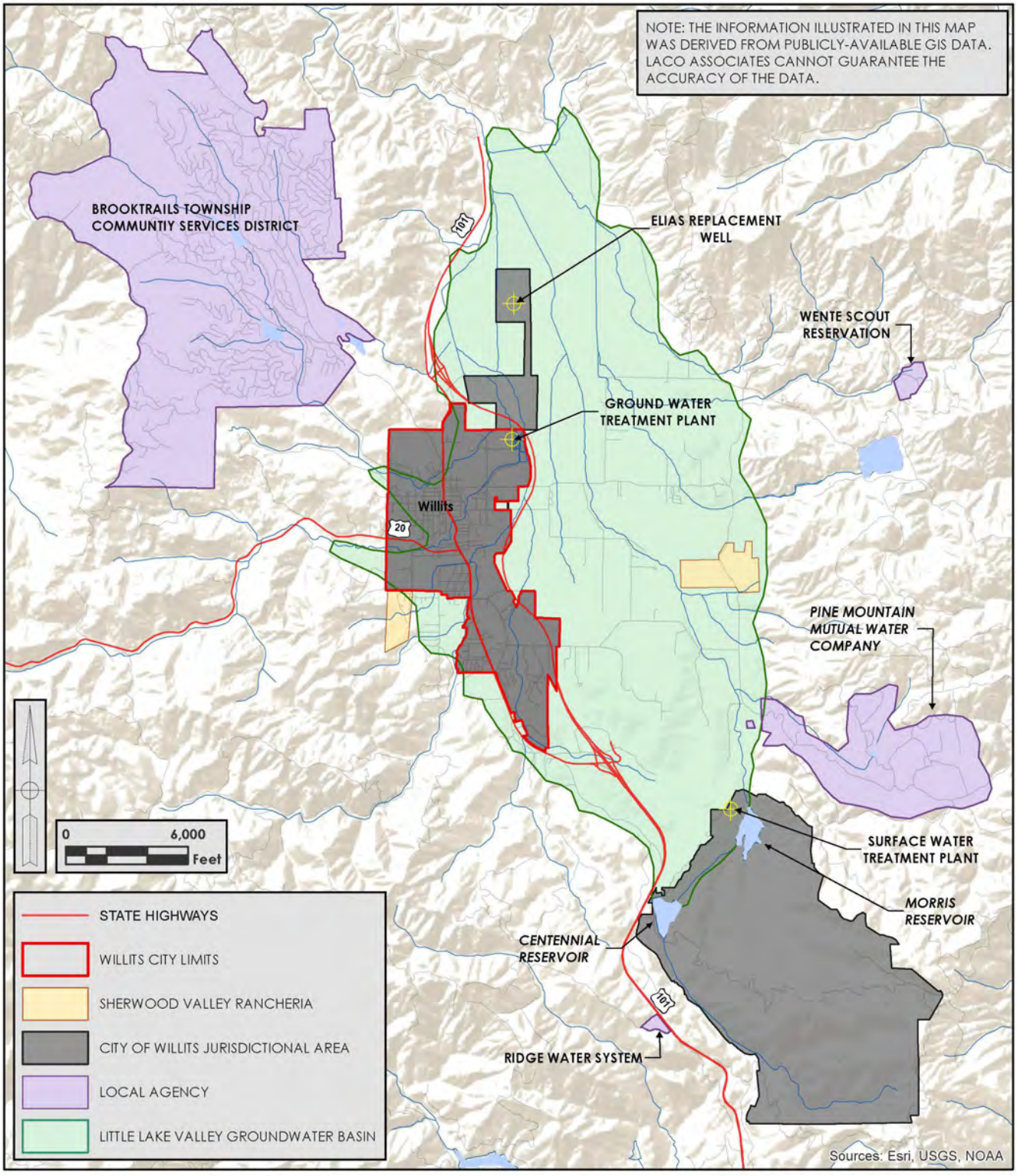


Table 3.18a 2019-2022 Average Surface Water Production

Month	**Average Production (MGM)**
January	18.1
February	17.2
March	20.1
April	21.4
May	22.6
June	26.1
July	30.1
August	29.6
September	26.6
October	22.7
November	18.3
December	17.7
Total (Avg./Month)	*22.5*
Total (Annual)	**270.5 million gallons**

Source: LACO 2023a, Table 2-1.

Surface water is treated at the City's WTP located adjacent to the Morris Dam using alternative filtration technology, an upflow clarifier process, and disinfection with sodium hypochlorite (LAFCo 2019). The WTP was upgraded in 2015 to include additional filters and tank liners, a new upflow solids contact clarifier, and approximately 3,400 feet of piping replacements (LAFCo 2019). The WTP has a treatment capacity of 3.3 million gallons per day (MGD), 100 MGM, or 3,682 AF per year. This treatment capacity is much greater than the current average usage by the City. The treated water is first stored at a 1.5 MG chlorine contact tank and then conveyed by gravity through a 16-inch water main that runs down from Davis Creek, along East Side Road and East Hill Road to the primary 3 MG storage tank above Baechtel Road.

The City additionally has water rights for diversion from Davis Creek for municipal uses totaling 2,615 AF per year (City of Willits 2023).

Groundwater

In response to the severe drought conditions from 2013 to 2014 that prompted declaration of a Stage 5 Water emergency, the City developed the Elias Replacement Well (ERW) and GWTP to supplement the surface water sources. The ERW is within the Little Lake Valley groundwater basin, is approximately 200 feet deep, and currently has a 30 horsepower (hp) pump that produces approximately 330 gallons per minute (GPM). The GWTP, which treats groundwater from the ERW, is located off Sewer Plant Road, within the City of Willits. The extracted groundwater is relatively high in manganese and iron. To address

this, the GWTP utilizes filtration and chlorine addition to oxidize the manganese prior to filtration and to provide disinfection residual (LACO 2019). The ERW was put into service in late 2015 after being approved by the State Water Resources Control Board (SWRCB) Division of Drinking Water as a public water source for emergency use. In 2017, non-emergency use of this groundwater supply was approved by the SWRCB Division of Drinking Water and on August 9, 2017, the Willits City Council approved full-time use of the ERW to supplement the surface water supply (LAFCo 2019). In 2022, the City implemented the City of Willits Groundwater Resiliency Improvement Project (Groundwater Project) in order to increase the transfer capacity from the ERW to the GWTP. The Groundwater Project included upgrading 3,600 feet of pipe connecting the ERW to the GWTP from 6-inch Schedule 40 Polyvinyl Chloride (PVC) pipe to 10-inch high-density polyethylene (HDPE) pipe. In 2022, as part of the public hearing process for the Groundwater Project's environmental review, the Willits City Council approved managed use of the groundwater supply pursuant to a Groundwater Operational Use Plan. The Groundwater Operational Use Plan (City of Willits 2022) allows for an average use of 8 MGM for domestic purposes, unless an emergency situation occurs, or regular operation and maintenance of the City's water system requires the City to use in excess of that amount, at which time Council would be apprised of the need for the increased amount. The City produced approximately 14.0 MG of groundwater in 2021 and 21.6 MG in 2022, as shown in Table 3.18b, below (Communications with City Staff 2023; LACO 2023a). In 2019, 13.6 MG of groundwater was produced; however, a monthly break down of the production at the GWTP was not available for 2019 so that data is not included in Table 3.18c. Groundwater was not used in 2020.

Table 3.18b 2021 and 2022 Average Groundwater Production

Month	**2021 Production (MGM)**	**2022 Production (MGM)**
January	0	0
February	0	0
March	0	0
April	0	0
May	0	6.3
June	0	6.0
July	0	2.2
August	0	2.8
September	0	2.6
October	0	0
November	6.0	0
December	8.0	1.7
Total (Avg./Month)	1.2	1.8
Total (Annual)	**14.0 million gallons**	**21.6 million gallons**

Source: LACO 2023a, Table 2-2.

Water Source Summary

Including the City's storage capacity from the reservoirs, groundwater source production, and the water rights for diversion from Davis Creek, the City has a total theoretical water supply of 4,317 AF per year. This is summarized in Table 3.18c, below.

Table 3.18c City of Willits Theoretical Water Supply

Water Source	Water Supply (AF per year)
Reservoirs	1,300
Groundwater	402
Davis Creek Water Right Diversion	2,615
Total Water Supply	**4,317 AF per year**

Source: LACO 2023b, Table 5.

WATER SYSTEM SERVICE AREA AND INFRASTRUCTURE

The City water system service area includes the incorporated City and certain surrounding areas, serving a population of 5,500 to 6,600 people (LACO 2019). This population is served through a total of 2,412 connections, including 1,909 single-family residential (SFR) connections, 503 non-SFR/non-fire protection connections, and 55 fire connections that provide fire protection for commercial and industrial buildings (City of Willits 2023a). This includes 437 out-of-agency services (OAS) connections outside the City limits. This is shown on Figure 2 of the Land Use Element Update Infrastructure Assessment (LACO, 2023b), see Figure 3.18-2 in Appendix F. This figure provides an overview of the City's distribution system, including the OAS connections. These OAS connections serve individual homeowners and groups of homeowners from master meters located at the City limits. Pursuant to an agreement signed in November 1995, the City provides water and wastewater services to the Sherwood Valley Band of Pomo Indians Rancheria (Rancheria) located southwest of the City limits, which includes residential units, a community center, and the Sherwood Valley Casino. Through this agreement, the City provides for the water needs of up to 50 residential units, or functional equivalent (LAFCo 2019).

As shown on Figure 3 of the Land Use Element Update Infrastructure Assessment in Appendix F (LACO 2023b), see Figure 3.18c, the City water distribution system includes approximately 28 miles of transmission and distribution lines of various sizes, six (6) treated water storage tanks, three (3) pump stations, and 240 fire hydrants (Communications with City Staff 2023). The City water distribution system is divided into seven (7) pressure zones: Berry Hill, Bittenbender, East Hill, Main, Meadowbrook, Northbrook, and Redwood. Treated water from the WTP is conveyed 2.5 miles to the distribution system via a single 16-inch transmission line. This 16-inch transmission line serves the OAS connections southeast of the City between the WTP and the City limits. In addition to the surface water infrastructure, the ERW is connected to the GWTP via 8,200 feet of transmission line that mainly crosses pastureland north of the City limits (LACO 2019).

The six (6) water storage tanks provide a total of 4.72 MG of water storage and are located throughout the City water system service area. The sizes, dates of installation, and locations of these tanks are provided in Table 3.18c, below.

Figure 3.18b Out of Agency Services

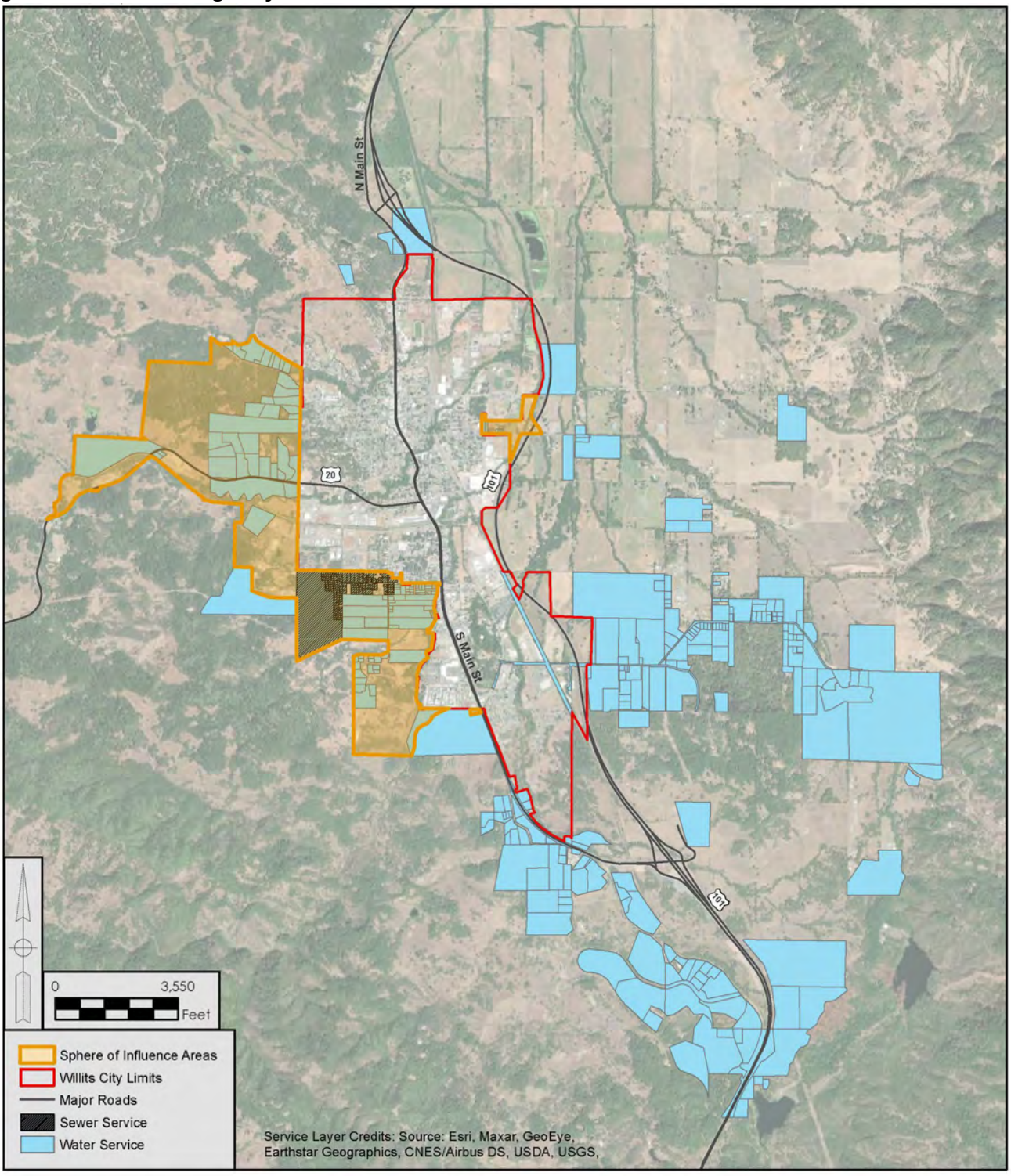


Figure 3.18c Water Distribution System

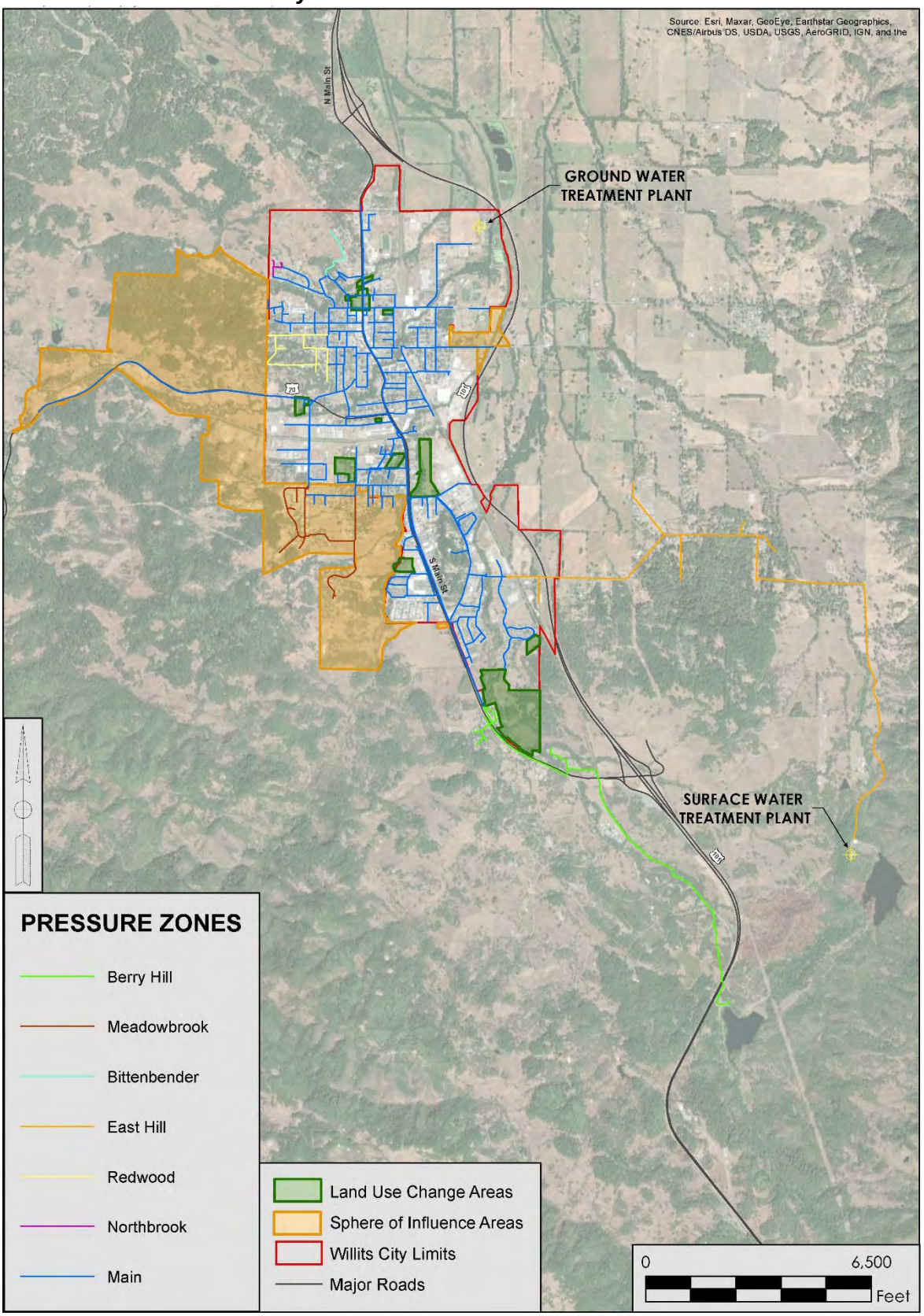


Figure 3.18d Water Distribution System – All Facilities

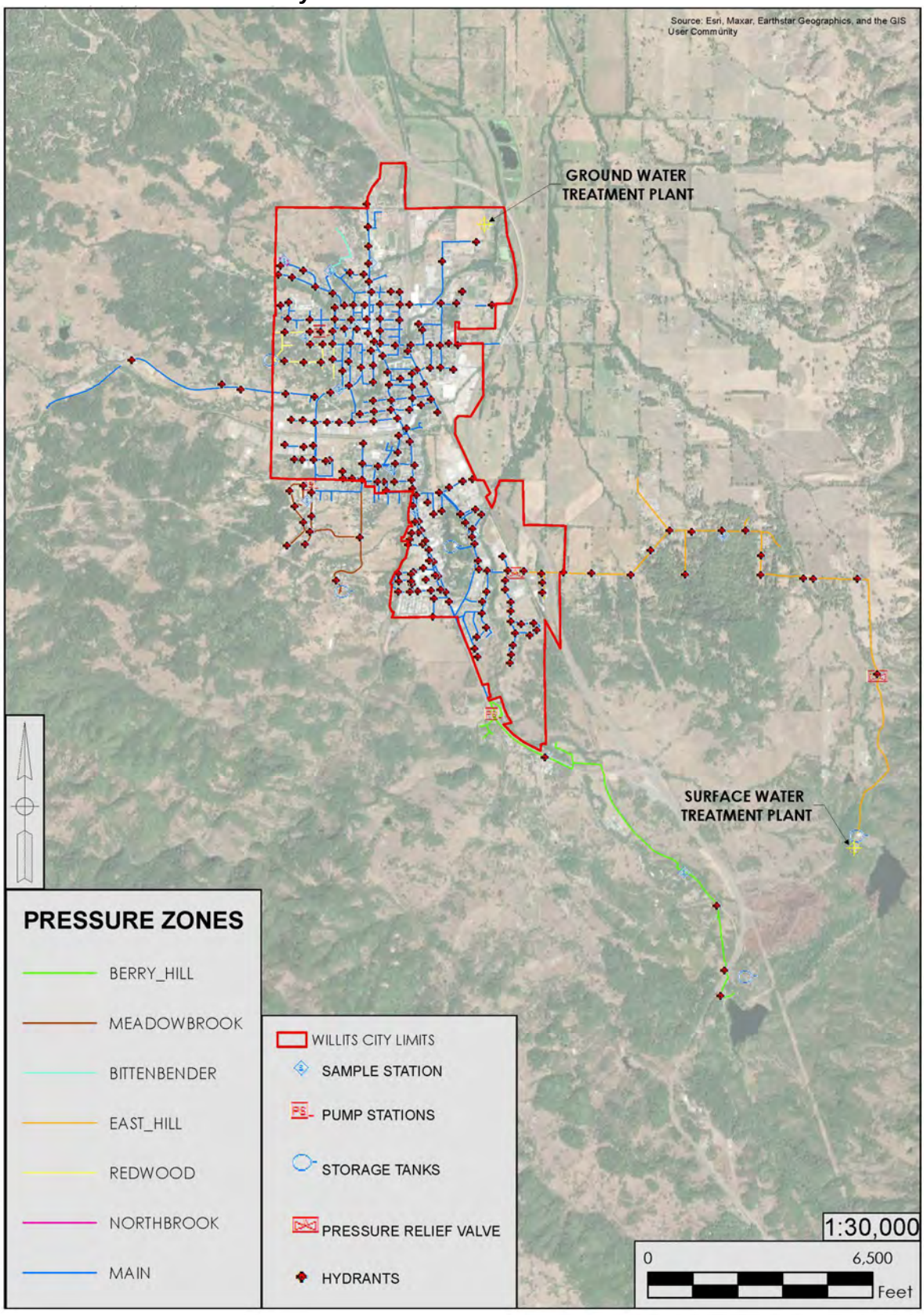


Table 3.18d Water Storage Tank Data

Volume	Date Installed	Location	Pressure Zone
3 MG	1980	Baechtel Road	Main
1.5 MG	1989	Adjacent to WTP	East Hill
125,000 gallons	1993	Locust Street	Meadowbrook
43,000 gallons	1977	Laurel Street	Redwood
43,000 gallons	1980	Berry Hill	Berry Hill
3,000 gallons	Not available	Northbrook neighborhood	Northbrook
1,600 gallons	Not available	Bittenbender Pressure Zone	Bittenbender
3 MG	1980	Baechtel Road	Main

Source: LACO 2023a, Table 2-5.

General System Constraints

Water Supply

With the majority of its water supply from surface water, the City water system is susceptible to impacts from drought conditions. While the City is able to utilize groundwater from the ERW to supplement its surface water supply, based on the 8 MGM limitation on the use of groundwater (City of Willits 2022) and the estimated monthly demand of 18.7 MGM for the entire distribution system (Communications with City Staff 2023), the groundwater supply is insufficient to fulfill current demands on the water supply system, in the event surface water supplies are compromised. To fulfill future demand, with the current water sources and without increasing the use of groundwater supplies, the City could increase its water supply by increasing the storage capacity of its reservoirs and/or developing an additional water supply source. Either of these actions would require analysis that is outside the scope of this report as well as an amendment to the City's domestic water supply permit through the SWRCB. To address the water supply capacity the following is a list of potential projects the City could undertake to increase source capacity:

1. Perform a hydrogeologic study of the confined aquifer that supplies the ERW. The study would include groundwater modeling to further evaluate impacts to neighboring wells and constituent transport within the aquifer. Based on previous studies of the aquifer, the source capacity of the groundwater basin exceeds the surface water storage potential by tens of thousands of AF.

2. Under the current SWRCB permit (Water System No. CA 2310004) the ERW is listed as a source of water and the Ground Water Assessment sheet included in the application estimates the groundwater source production at 131 MG (or 402 AF) per year. This annual production would satisfy approximately 50 percent of the City's current water demand. The positive production at the GWTP is limited by the pressure in the distribution system at the point of connection and additional analysis is necessary to identify alternatives to overcome the pressure to achieve a higher production rate. These alternatives could include increasing the pressure at the GWTP and installing pressure reduction systems at individual connections in the GWTP vicinity, as necessary; or installing a separate water line that connects the GWTP directly to one of the storage tanks within the distribution system, thereby avoiding the pressure increase at the point of connection.

3. Dredge Morris Reservoir to remove sedimentation from that has accumulated since 1926. According to the reservoir construction plans, the reservoir would have a capacity of 940 AF at the current maximum water surface elevation. This is an increase of 278 AF in storage (42 percent) or just over 90 MG. However, this would require the removal and disposal of nearly 450,000 cubic yards, which could cost approximately $10 to 20 million.
4. Increase the height of the flashboards at Morris Dam. “The 1985 Water System Master Plan indicated that increasing the Morris Dam flashboard height to 3.7 feet would provide 60 AF of additional storage capacity” or approximately 20 MG (West Yost 2006).
5. Raise the flashboards at Centennial Reservoir. The City is currently working on a project that will replace the wood flashboards with an inflatable dam that will improve safety and provide better control over water surface elevation and storage. To determine the potential increase in storage capacity, a bathymetric survey would need to be conducted.
6. Raise or replace Morris Dam. Increasing the height of Morris Dam by 50 feet would increase the storage capacity by 2,000 to 3,000 AF (West Yost 2006). Since the West Yost study in 2006, the City commissioned a structural evaluation of the dam which determined the dam could be raised up to 20 feet without demolition of the existing dam.

In order for the City to amend the existing drinking water permit, at least two of the steps detailed above would have to be completed to provide a more balanced basis for calculating the number of connections available to support future growth. At a minimum, the additional water storage within the distribution would be necessary to resolve the deficiencies noted in the 2016 letter from the SWRCB Division of Drinking Water and additional source capacity developed either through groundwater system improvements or reservoir modifications and/or maintenance.

The City would then submit an application for an amended domestic water supply permit per Title 22, Section 64556 of the California Code of Regulations, subsection (a) (5), “Expansion of the existing service area by 20% or more of the number of service connections specified in the most recent permit or permit amendment.” This application is available on the SWRCB’s website (SWRCB 2020).

Infrastructure

Infrastructure constraints include both distribution system and storage limitations. These constraints are dependent, in part, on the pressure zone within the system. Based on storage tank capacity alone, the theoretical maximum service connections for the 3 MG tank (directly serving the Main pressure zone and indirectly serving the Meadowbrook, Redwood, Berry Hill, Northbrook, and Bittenbender pressure zones) was estimated to be 3,613 in 2016 and at that time, there were 2,302 connections already established (SWRCB 2016). Per the SWRCB (2016), expansion of the City’s service area by more than 20-percent of the number of service connections would require approval of a domestic water supply permit amendment through the Division of Drinking Water. Theoretically, 20 percent of the 2,302 total connections in 2016 would be 460 connections that could be added to the City’s water system without an amendment to the City’s domestic water supply permit through the SWRCB Division of Drinking Water. Since 2016, approximately 40 additional connections have been approved and installed leaving approximately 420 additional connections that could be approved without amendment This 2016 analysis additionally found that the Bittenbender, Northbrook, Berry Hill, and Laurel Street pressure zones had deficient storage both with and without considering fire flow needs and Locust Street was found to have deficient storage when considering fire flow needs (SWRCB 2016). Additional connections should not be

established in these pressure zones without an increase in the storage tank capacity available within each specific area.

In addition to storage capacity, the size of distribution mains in areas considered for expansion would need to be reviewed as well as the water pressure available for fire flow purposes. For instance, the water main that runs along Locust Street between Della Avenue and the water storage tank is a 6-inch asbestos cement pipe. For substantial development to occur south of Della Avenue, the size of the water main would need to be increased to accommodate domestic usage and fire flow requirements. The development of a water system master plan would provide the City with a tool with which it could accurately determine the water infrastructure improvements necessary to accommodate future developments.

In summary, the ability of the City to source both groundwater and surface water combined with the amount of source water available creates the opportunity for the City to support future growth. This support could be accomplished with planned improvements directed towards improving the groundwater access and delivery systems along with regular maintenance to improve and maintain surface water storage capacity.

City of Willits Wastewater System

The City owns, operates, and maintains a public wastewater system that includes wastewater collection infrastructure, a wastewater treatment plant (WWTP), and water reclamation facilities. This section describes the existing conditions of the wastewater collection and treatment system.

Wastewater System Service Area and Infrastructure

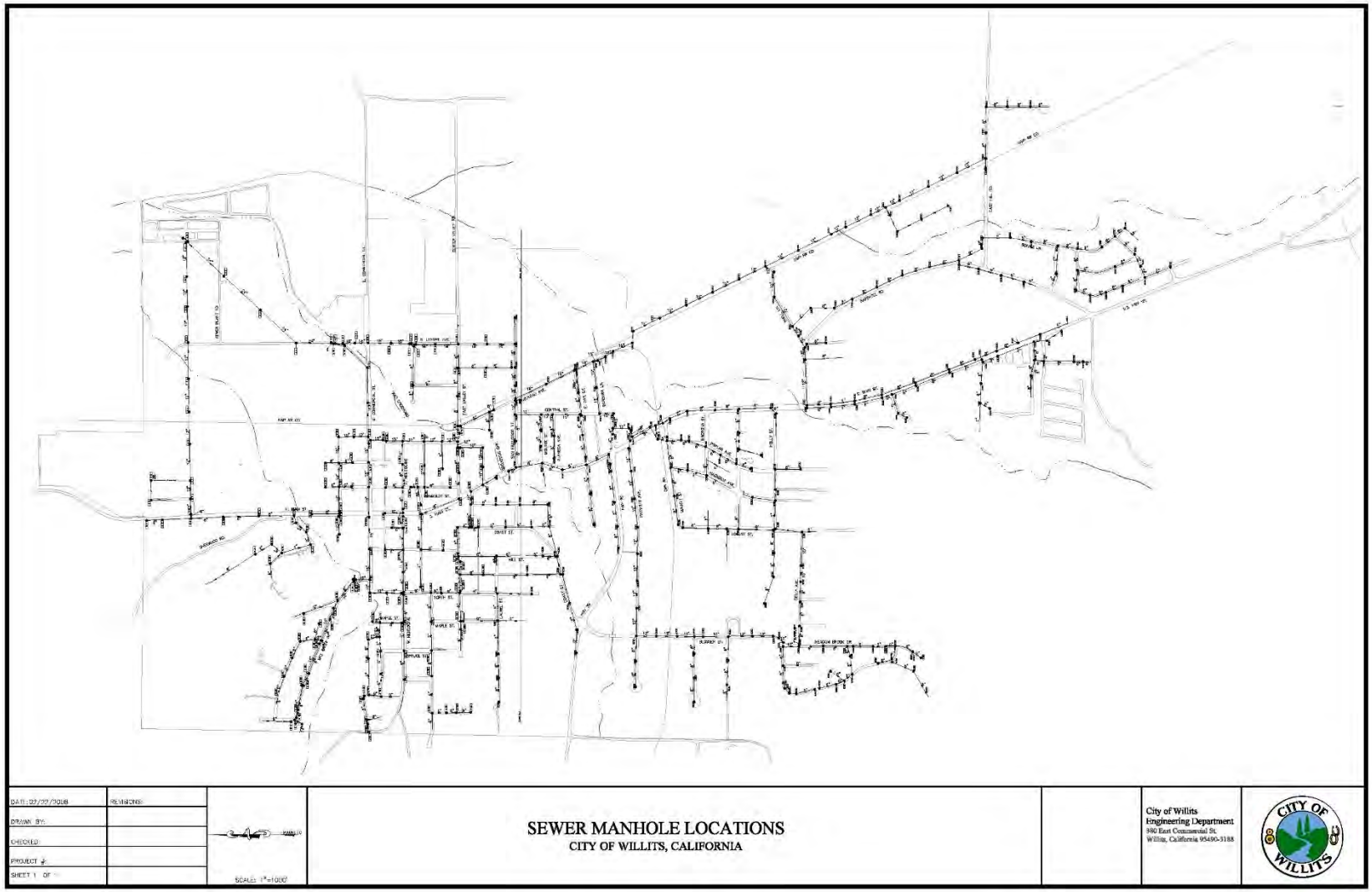
As provided in Table 3.18e, below, the City wastewater system serves an estimated population of 8,600 people, including 5,000 people in the incorporated City, 3,300 people in the Brooktrails Township Community Services District (BTCSD), 200 people in the Meadowbrook Manor County Sanitation District (Meadowbrook), and 100 people at the Sherwood Valley Band of Pomo Indians Rancheria. The out-of-agency service OAS areas are shown in Figure 3.18-2. Figure 3.18e (City of Willits 2008), shows the City's overall wastewater collection system. The BTCSD, has approximately 1,560 OAS connections that are served by agreement, with the City having provided wastewater treatment and disposal services to the BTCSD since 1967, Meadowbrook since 1956, and the Rancheria since 1989 (LAFCo 2019, City of Willits 2016).

Table 3.18e Geographic Breakdown of Population Serviced

Location	**Population Served**
Within City Limits	5,000
Brooktrails Township Community Services	3,300
Meadowbrook Manor Sanitation District	200
Sherwood Valley Band of Pomo Indians	100
Total	**8,600**

Source: LAFCo 2019, revised.

Figure 3.18e Wastewater Collection System



The City's wastewater collection system consists of 22 miles of gravity-fed sewer mains ranging in diameter from 4 to 24 inches, one (1) lift station, and 450 manholes (LAFCo 2019). The WWTP was constructed in 1975 as a secondary aeration treatment plant and has since gone through several upgrades. Currently, the WWTP utilizes grit removal, two (2) extended aeration basins, a circular clarifier, ultraviolet (UV) disinfection, and an enhanced effluent polishing in a 30-acre treatment wetland. The WWTP also includes associated reclamation and disposal facilities. In accordance with the City's Waste Discharge Requirements and Master Recycling Permit (Order No. R1-2021-0021) issued under National Pollutant Discharge Elimination System (NPDES) permit No. CA0023060 by the North Coast Regional Water Quality Control Board (Regional Board), treated effluent is discharged to Outlet Creek (downstream of the confluence of Broaddus Creek and Baechtel Creek) from October 1 through May 14. From May 15 through September 30, treated effluent is recycled as irrigation water on the surrounding pasture lands.

Current Wastewater Production

The WWTP has a maximum allowable daily flow (design capacity) of 7.0 MGD, with a permitted average monthly flow of 4.0 MGD (LAFCo 2019) and an average dry weather flow capacity of 1.13 MGD (City of Willits 2023b). The City currently treats an average of 0.65 MGD during the dry weather season, which is assumed to not include infiltration and inflow (I/I) flows. The WWTP receives an average of 1.2 MGD in wet weather flow, meaning that I/I is responsible for approximately 46 percent of the inflow to the WWTP. Additionally, pursuant to a 2014 contract amendment between the City and BTCSD, the BTCSD has an exclusive right to dispose of 0.49 MGD of effluent. The BTCSD contributes approximately 30 percent of the effluent treated at the WWTP (LAFCo 2019).

The average yearly inflow for the plant is 274 MG. Table 3.18f, below, provides average daily wastewater flows for 2021 and 2022. The flows reported are based on dry weather flows reported from June 1 to September 30. Due to the observed I/I in wet weather months (October 1 to May 31), dry weather flows provide a more accurate summary of average wastewater flows.

Table 3.18f Average Daily Wastewater Production

Year	Willits (MGD)	BTCSD (MGD)	Total (MGD)
2021	0.37	0.20	0.57
2022	0.41	0.22	0.63
Average	0.39	0.21	0.60

Source: City of Willits 2023b.

Table 3.18-6 shows the breakdown of average dry weather wastewater flow rates for two consecutive years that differ in total wastewater treated. However, the average contribution is the same (within less than one percentage point) at 65 percent of the wastewater produced by the City of Willits (including Meadowbrook and Sherwood Valley Band of Pomo Indians) and 35 percent produced by the BTCSD.

Under the City's NPDES permit, the wastewater treatment facility measures and monitors specific constituent concentrations at four primary locations: 1) the raw sewage as it enters the facility or INF-001; 2) at a point between the mechanical treatment plant on the west side of Outlet and Broaddus Creek and the enhancement wetlands on the east side of Outlet Creek, or EFF-002/INT-002; 3) at the outlet of the enhancement wetlands at the north end where treated wastewater is discharged into outlet creek, or EFF-003; and 4) at the outlet of the enhancement wetlands at the north end where treated wastewater

that meets Title 22 Secondary-23 requirements is pumped to the north to irrigate pastures for fodder for non-dairy cattle. Each of the discharge points has different effluent quality requirements and the City has continuously met the treatment requirements. A summary of average constituent concentrations and wastewater characteristics are shown in Table 3.18g, below.

It is also important to note that the City is currently the only wastewater treatment facility in Mendocino County that accepts septage from septic haulers. The significance is that the septage brought in to the WWTP comes from private septic tanks and portable toilets and is a highly concentrated load of wastewater that is more difficult to treat than the standards domestic wastewater from the collection system. This septage is discharged into a septage receiving station that measures the volume for billing purposes and is then piped to a holding pond to the west of the treatment plant office. The concentrated flow is then mixed with higher flows during the winter so that it can be effectively treated.

Table 3.18g Typical Wastewater Characteristics for the City of Willits

Characteristic	**Year and Concentration**		
	2020	***2021***	***2022***
Biosolids (tons)	127.3	76.7	112.8
Septage Received (MG)	1.87	1.96	2.05
Influent (INF-001)			
BOD (avg)	381	244	240
pH (avg)	7.3	7.2	7.2
Total Suspended Solids (avg mg/L)	260	216	261
Maximum Influent (MGD)	3.6	5.5	7.9
Effluent to Enhancement Wetlands (EFF-002 or INT-002)			
BOD (avg)	6.1	5	5
pH (avg)	7.0	7.0	7.0
Total Suspended Solids (avg mg/L)	1.6	1.8	1.7
Total Coliform (avg)	11.7	3.2	1.8
Total Nitrogen (avg mg/L)	2.8	3.2	3.3
Maximum Effluent (MGD)	1.8	3.8	4.1
Effluent to Outlet Creek (EFF-033)			
Total Nitrogen (avg mg/L)	1.5	1.6	1.5
Phosphorus (avg mg/L)	2.1	1.2	1.4

Characteristic	Year and Concentration		
	2020	***2021***	***2022***
Total Hardness ($CaCO_3$ avg mg/L)	86	105	107
Effluent to Irrigation (EFF-004)			
Total Nitrogen (avg mg/L)	3.6	3.5	4.6
Phosphorus (avg mg/L)	14	2.3	3.3
Chloride (avg mg/L)	63.1	67.8	35.4
Boron (avg mg/L)	0.3	0.4	0.3
Sodium (avg mg/L)	51.7	57.5	36.6

Source: LACO 2023a, Table 3-3.

General System Constraints

Generally, the WWTP and collection system are adequately sized to support future growth. However, as the City grows and the sphere of influence (SOI) expands, one constraint will be the ability to convey the wastewater by way of gravity. As the end users move further away from the WWTP, sewer lift stations will be required in some areas. Expansion into the Locust Street area, for instance, will require a lift station based on topography. The one benefit to a lift station is being able to pump the raw sewage through a smaller pipe to a point where that volume of sewage can be conveyed in the existing collection system.

Considering the average dry weather flow for the City over the past two years has been 0.39 MGD (389,314 GPD), the City has 0.25 MGD remaining in its portion of the treatment capacity. This equates to a capacity for an increase of 64 percent in wastewater production. Modifications to the WWTP would likely be necessary as wastewater flows increase and near design capacities.

City of Willits Storm Drain System

The City maintains storm drains citywide. This section describes the existing conditions of the City's storm drain system.

Storm Drainage System Conditions

The City's storm drain system consists of approximately 5.6 miles of storm drain lines as well as open channels and ditches. Of the storm drain lines, Table 3.18h, below, summarizes the type and lengths used within the City storm drain system. These facilities are part of an integrated system of roadside gutters, drainage ditches, and storm drain lines that are used to collect and convey the stormwater runoff from the City to the system's discharge points in Broaddus, Mill, Baechtel and Haehl Creeks. These creeks and all other drainages in the Little Lake Valley ultimately convey stormwater to Outlet Creek, which leaves the valley at the north end and is a tributary to the Main Fork of the Eel River.

Table 3.18h Storm Drain Pipe Type and Length

Type	Total Length Used (ft)
Corrugated Metal Pipe (CMP)	14,370
Reinforced Concrete Pipe (RCP)	10,235
Clay	3,544
Plastic*	1,470
Total	**29,619 ft (5.6 miles)**
Notes: *Includes High Density Polyethylene (HDPE), Polyvinyl chloride (PVC), & PVC SDR-35	

Source: City of Willits Not Dated.

Although the County of Mendocino (County) developed a Storm Water Management program for unincorporated urbanized areas within the County to comply with the Federal Stormwater Phase II Final Rule (Phase II Rule), the rule only applies to operators of small municipal separate storm sewer systems (MS4s). As the City is not an MS4, it is not subject to the Phase II Rule. However, in 2009, the City developed Low Impact Design (LID) Guidelines for Stormwater Management for new developments and new stormwater infrastructure.

The City is responsible for maintenance of the storm drain system within the City limits. As the southern portion of Main Street is also identified as Highway 20, storm drain facilities along Main Street from Highway 20 to the north to the Highway 101 off-ramp to the south are maintained by Caltrans. Additional roadside drainage facilities outside the City limits are maintained by the County, who owns and maintains County roads.

General System Constraints

The City is located within the Little Lake Valley, which contains a large marshy area at the northern extent of the valley that floods seasonally. The extents of the Little Lake Valley Groundwater Basin, surface water bodies, and the flood zones mapped by the Federal Emergency Management Agency (FEMA) are shown on Figure 3.10a in Section 3.10 Hydrology and Water Quality (Figure 4-1 from the Existing Conditions Report (LACO 2023a).

During some winter seasons, the northern extent of the valley forms Little Lake, a shallow lake that spans several hundred acres (City of Willits 2020). Peak flows increase on the northern end of the City limits, nearer the confluence of the various creeks and localized flooding occurs every two (2) to three (3) years along East Commercial Street and East Valley Street. This is also typical for the Walnut Street area; Highway 20, Manor Way, and Alder Lane at the south end of the City; and other areas adjacent to Broaddus, Baechtel, and Mill Creeks.

From a hydrologic perspective, the stormwater flows within the City limits tend to peak quickly during an intense rainfall event and recede quickly once the intensity decreases. This is primarily based on the location of the valley near the upper end of the Outlet Creek watershed. When considering the hydraulics associated with the drainage within the City, there are three primary limiting factors:

1. Undersized drainage facilities.
2. Overgrown and blocked stream channels.

3. Water surface elevation in receiving waters.

These three factors have distinct impacts on drainage and overlap during a storm event. For instance, the drainage channel along the north side of Walnut Street has become a narrow channel that has been overgrown with vegetation and passes under Highway 20 through a box culvert that does not have the capacity to convey peak flows during storm events that are less than five-year events. The issues at the south end of town are caused by undersized drainage facilities that are either owned by Caltrans or on private property. The only place the drainage system crosses the City right-of-way is at Manor Way and the drainage pipe is within a storm drain easement of unknown ownership.

Regardless of the adequacy of the drainage system capacity, the water surface elevation in the receiving water can restrict flow and cause stormwater to backup into the City roadways. This becomes more problematic at the northern end of the City as the water level in the creeks and in the valley increases as stormwater accumulates. A separate drainage study, or studies to evaluate the problematic areas of the City is needed to better define the constraints and identify mitigation opportunities.

RECYCLING AND SOLID WASTE

Recycling and Solid Waste Collection System

The Mendocino Solid Waste Management Authority (MendoRecycle) was formed in 1990 by the County and three (3) cities (Ukiah, Willits, and Fort Bragg) to provide administrative oversight and program implementation for solid waste and recycling in the County. MendoRecycle also operates the household hazardous waste facility in Ukiah (MendoRecycle 2023). The Mendocino County Division of Environmental Health (EH) serves as the Local Enforcement Agency (LEA) for the California Integrated Waste Management Board, issuing permits and inspecting solid waste facilities for compliance with state laws. EH regulates and inspects more than 50 solid waste facilities in Mendocino County, including: 5 closed/inactive municipal landfills, 3 woodwaste disposal sites, 2 composting facilities, and 11 transfer stations (County of Mendocino, 2023). According to Chapter 3 (Development Element) of the Mendocino County General Plan (2009), there are no operating landfills within the County; as such, solid waste generated throughout the County is exported to the Potrero Hills Landfill in Solano County for disposal. The Potrero Hills Landfill has a maximum permitted throughput of 4,330 tons per day and a remaining capacity of 13.872 million cubic yards. The landfill is anticipated to remain open until February 14, 2048 (CalRecycle 2019).

The City has a Franchise Agreement (Agreement) with Solid Wastes of Willits, Inc. (SWOW) for solid waste collection, transportation, disposal, and recycling for the City and surrounding areas. The City's current Agreement with SWOW is dated November 1, 2015, and is set for expire December 31, 2023, unless extended or terminated by that date. Within the area covered by the Agreement (2015), SWOW is generally responsible for collecting solid waste, mixed organic waste, and recyclable materials; transporting collecting materials to the appropriate disposal/processing site; processing recycling materials; collecting demolition and construction debris; and operating a recyclable material buy-back center. Curbside pickup for both garbage and recycling occurs Monday through Friday depending on the location within the City. In addition, SWOW maintains a recycle center at the Willits Transfer Station located on the west side of the City at 350 Franklin Street. Recyclables are accepted at no charge and may include: newspapers, cardboard, office paper, food and beverage glass, steel cans, plastic food and beverage containers, and aluminum cans. Yard waste is picked up on Fridays with an alternating schedule between areas located west and east of the former US Highway 101 corridor. From the transfer

station, the sorted recyclables are then baled and shipped to various brokers and manufacturers for reuse. Non-recyclable solid wastes are transported to a permitted landfill for disposal.

General Service Constraints

There are currently no known recycling and solid waste service constraints in the City.

Energy Sources

Pacific Gas and Electric (PG&E) is the main supplier of electricity and natural gas as there are no power production plants in the City. Sonoma Clean Power is a program that allows businesses and residents in Mendocino and Sonoma Counties to purchase emergency from renewable resources, including geothermal, solar, wind, and biomass. This is provided to PG&E customers. For customers that enroll in the program, the renewably sourced energy is delivered through PG&E infrastructure. Sonoma Clean Power is therefore billed to customers through PG&E.

Telecommunications

Telecommunication is transmitting information over various forms of technology, including wire, radio, optical or electromagnetic means. In 2021, 95 percent of California households had any type of internet access, including from a cell phone (Public Policy Institute 2023). In the City, AT&T and Verizon are the primary telephone service providers. Internet communications services are provided by Xfinity/Comcast, Willits Online, and Hughes Net. Cable television is provided by Xfinity/Comcast.

Regulatory Setting

Federal

Clean Water Act

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental Protection Agency (USEPA) the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the USEPA and U.S. Army Corps of Engineers. At the State and regional levels in California, the act is administered and enforced by the SWRCB and the nine Regional Boards.

Section 402 of the Clean Water Act requires that all construction sites on an acre or greater of land, as well as municipal, industrial and commercial facilities discharging wastewater or stormwater directly from a point source, such as a pipe, ditch, or channel, into a surface water of the United States must obtain permission under the NPDES permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) regulates public water systems that supply drinking water. The principal objective of the federal SDWA is to ensure that water from the tap is potable (safe and satisfactory for drinking, cooking, and hygiene). The main components of the federal SDWA are to:

1. Ensure that water from the tap is potable.

2. Prevent contamination of groundwater aquifers that are the main source of drinking water for a community.
3. Regulate the discharge of wastes into underground injection wells pursuant to the Underground Injection Control program (see 40 Code of Federal Regulations Section 144).
4. Regulate Distribution Systems

Title 40 of the Code of Federal Regulations

Title 40 of the Code of Federal Regulations, Part 258 (Resource Conservation and Recovery Act Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 set energy efficiency standards for lighting (specifically light bulbs) and appliances.

Energy Star Program

Energy Star is a voluntary labeling program introduced by the USEPA to identify and promote energy-efficient products to reduce greenhouse gas emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes (USEPA 2022).

Telecommunications Act

In 1996, the Federal Communications Commission (FCC) passed the Telecommunications Act, allowing any communications business to compete in any market against any other business. This act affects telephone service, cable programming, and other video services, including broadcast services and services provided to schools (FCC 2022).

REGIONAL

Water and Wastewater

Sustainable Groundwater Management Act

In September 2014, the Governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the California Department of Water Resources.

California Department of Water Resources

The California Department of Water Resources is responsible for preparing and updating the California Water Plan, which is a policy document that guides the development and management of State water resources. The plan is updated every five years to reflect changes in resources and urban, agricultural, and environmental water demands. The California Water Plan suggests ways of managing demand and augmenting supply to balance water supply with demand.

Porter-Cologne Water Quality Control Act (California Water Code)

The State of California is authorized to administer Federal or State laws regulating water pollution within the State. The Porter-Cologne Water Quality Control Act (Water Code Section 13000, et seq.) includes provisions to address requirements of the Clean Water Act. These provisions include NPDES permitting, dredge and fill programs, and civil and administrative penalties. The Porter-Cologne Act is broad in scope and addresses issues relating to the conservation, control, and utilization of the water resources of the State. Additionally, the Porter-Cologne Act states that the quality of all the waters of the State, including groundwater and surface water, must be protected for the use and enjoyment by the people of the State. In California, the NPDES program is administered by the SWRCB through the RWQCB and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution.

Title 22 of California Code of Regulations

Title 22 regulates the use of reclaimed wastewater. In most cases only disinfected tertiary water may be used on food crops where the recycled water would come into contact with the edible portion of the crop. Disinfected secondary treatment may be used for food crops where the edible portion is produced below ground and will not come into contact with the secondary effluent. Lesser levels of treatment are required for other types of crops, such as orchards, vineyards, and fiber crops.

The California Department of Public Health sets specific requirements for treated effluent reuse, or recycled water, through Title 22 of the California Code of Regulations. These requirements are primarily set to protect public health. The California Code of Regulations Title 22, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered jointly by the California Department of Public Health and the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

Electricity and Natural Gas

California Energy Commission (CEC)

As the State's primary energy policy and planning agency, the CEC collaborates with State and federal agencies, utilities, and other stakeholders to develop and implement State energy policies. Since 1975, the CEC has been responsible for reducing the State's electricity and natural gas demand, primarily by adopting new Building and Appliance Energy Efficiency Standards that have contributed to keeping California's per capita electricity consumption relatively low. The CEC is also responsible for the certification and compliance of thermal power plants 50 megawatts and larger, including all project-related facilities in California (CEC 2022c).

California Public Utilities Commission (CPUC)

The CPUC regulates investor-owned electric and natural gas utilities operating in California. The energy work responsibilities of the CPUC are derived from the California State Constitution, specifically Article XII, Section 3 and other sections more generally, numerous State legislative enactments and various Federal statutory and administrative requirements. The CPUC regulates natural gas utility service for approximately 10.8 million customers that receive natural gas from PG&E and other natural gas utilities across California (CPUC 2022).

Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires a doubling of the energy efficiency savings in electricity and natural gas for retail customers through energy efficiency and conservation by December 31, 2030.

Solid Waste

California Department of Resources Recycling and Recovery

The California Department of Resources Recycling and Recovery (CalRecycle) oversees, manages, and monitors waste generated in California. CalRecycle provides limited grants and loans to help California cities, counties, businesses, and organizations meet the State waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites.

Assembly Bill (AB) 939

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.

Senate Bill (SB) 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. The Board is required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Assembly Bill 341 – Mandatory Commercial Recycling

The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. AB 341 required all businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units to recycle by July 1, 2012. AB 341 also sets a statewide goal of 75 percent waste diversion.

LOCAL

Vision 2020 Willits General Plan Revision (1992)

The Public Services and Facilities, Parks and Recreation Element of the General Plan (1992) contains the following goals and policies relating the ability of the City to provide adequate services and facilities to existing and new development:

6.210 Public Services and Facilities, Parks and Recreation Goal:
Ensure that development occurs in a manner which is consistent with the ability of local public agencies to provide adequate services and facilities within an efficient cost framework.

Public Services and Facilities

6.220 Continue to evaluate the capacity and effectiveness of local water, sanitary sewer, storm drainage and service delivery systems.

6.270 Continue to cooperate with local school districts to provide opportunities for recreational use of

6.300 Public Services and Facilities Implementation Measures

6.320 Require applicants for development projects to finance public infrastructure improvements which would be necessitated by project approval.

6.300 Public Services and Facilities, Mitigation Measures

4.621B Water saving devices, including low flow toilets and shower heads and drought-resistant landscaping, shall be required for all new development.

4.621C Enact a $500 per unit surcharge on new residential development to be earmarked toward eventual water treatment plant expansion.

4.6210 Expand the capacity of the City's wastewater treatment facility to 2.3 million gallons per day.

4.621E Rehabilitate the existing sewer system to reduce infiltration and inflow

City of Willits Municipal Code

The City of Willits Municipal Code (Municipal Code) includes directives to ensure the efficient use of water within the City. The Municipal Code is organized by title, chapter, and section. Most provisions related to water supply and conservation are included in Title 8, Health and Safety; Title 13, Public Services; and Title 15, Buildings and Construction.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS

Consistent with Appendix G of the State CEQA Guidelines, the Project would have a significant impact on utilities and service systems if it would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects;
2. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years;
3. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments;
4. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
5. Not comply with federal, state and local management and reduction statutes and regulations related to solid waste.

METHODOLOGY

Potential impacts on utilities and service systems are analyzed based on the potential for the proposed Project to affect the wastewater, water, stormwater, and solid waste facilities during construction or operation, as indicated in the thresholds above.

PROJECT IMPACTS AND MITIGATION

Impact UTL-01: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

As discussed in Chapter 3.0, Project Description, this Draft PEIR evaluates the impacts associated with the City's projected growth the growth during the planning period, a total population of 7,500 in 2043. The Draft PEIR does not analyze buildout of all allocated land use within the City and its proposed SOI, because based upon foreseeable population trends, buildout of all land uses is highly speculative and is not projected to occur within the next 100 years.

Development facilitated by the Project would create additional demand for water, wastewater, electricity, natural gas, telecommunication and stormwater drainage facilities. Relevant policies proposed as part of the Project include Policies LU-1.1, LU-1.2, and LU-1.3, below, which plan for a range of potential population growth levels within the City. These direct growth to where infrastructure either already exists, or doesn't exceed the capacity of existing infrastructure.

- **LU-1.1 Planning Area:** The Planning Area shown in Figure 3.0-1 includes lands around the City where future land use changes could affect the City of Willits. Mapping showing the planning area boundary shall be provided by the City to Mendocino County and the Local Agency Formation Commission (LAFCo) with a request that all land use and development applications received by the County and LAFCo be referred to the City for review and comment. Encourage the County to implement measures to protect the watersheds and groundwater recharge areas within the Planning Area.
- **LU-1.2 Sphere of Influence:** The Sphere of Influence (SOI) shown in Figure 3.0-2 represents the potential boundaries of the City and its service areas, defines land eligible for annexation to the City in the future, and includes adequate land to accommodate potential future growth. Annexations to the City may only be approved when such lands are within the LAFCo approved SOI and the annexation is consistent with the goals and policies of this plan.
- **LU-1.3 Areas of Interest:** The Area of Interest includes areas beyond the City's SOI that are important to the City and contain characteristics such as entrances to the City along important travel routes, areas where highway related commercial development could impact business vitality within the City, or areas where the City of Willits provides out of area water or wastewater services. Existing land use and future development within Areas of Interest could have a direct impact on health, safety, and welfare of City residents and the City shall request that responsible agencies, including Mendocino County, the Mendocino Local Agency Formation Commission, and Caltrans give special consideration to the recommendations and comments of the City of Willits.

The Project may facilitate development that would require improvements to the City's water, wastewater, and stormwater drainage facilities; however, the impact would be anticipated to be less than significant. No new land uses are proposed under the Project that are atypical and incompatible with existing land uses within the City. Utility and service needs would be anticipated to be comparable to existing uses. Furthermore, as noted above, the City currently serves water to a large portion of the Planning Area, within the city limits, and outside the city limits through OAS connections. The City's method of serving these areas would remain unchanged. The City would be required to install infrastructure to extend water

and wastewater service to unserved land within the Planning Area; however, there are no new facilities proposed at this time. Generally, it is anticipated that construction of new facilities would result in similar physical impacts discussed throughout this Draft PEIR (i.e., impacts to biological resources, water quality and hydrology, air quality, agriculture, etc.), but impacts could also be reduced depending on location and intensity. As such, it is not possible to identify the specific nature, extent, and significance of physical impacts on the environment that could result from the construction of infrastructure without knowing the size, nature, or location of the required improvements. Regardless, new facilities would require the City to evaluate each development project for compliance with the General Plan, Municipal Code, and applicable regulations, and undergo CEQA review prior to implementation of improvements necessary to support such development. Additionally, electricity, natural gas, and telecommunications services are provided by PG&E and/or other service providers that would serve potential future development if the agency's standards were met. Overall, due to the location where future development would occur and with compliance with existing regulations and proposed Willits General Plan policies, impacts from water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities would be less than significant.

Mitigation Measure

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Impact UTL-02: Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Future growth and development facilitated by the Project would create additional demand for water in the Land Use Change Areas within the city limits, as well as within the SOI Area. Overall, the City appears to have sufficient water supply to serve the projected population of 7,500 persons planned for in this Draft PEIR, and additional development within the population planned for in this Draft PEIR would not necessitate the development of an additional water source.

Table 3.18i, below, shows the projected water demand that would be generated by the Land Use Change Areas and SOI Area in gallons per day (GPD). This table is based on the analysis provided in the Infrastructure Assessment in Appendix F (LACO 2023b) but is specific to the projected population of 7,500 persons. The water usage rates from the Infrastructure Report were utilized but the assumption for the projected population is specific to this Draft PEIR. Assuming the current population of the City is 5,008 persons (LACO 2023b), the Project is planning for approximately 2,492 persons in the planning period, or 2043.

Table 3.18i Projected Water Demand

Planning Period	Population (persons)	Water Usage Rate (gallons/day/capita)	Total Projected Water Use (GPD)
Planned for in Draft PEIR	2,492	74.8 [1]	186,402

Notes: Total Projected Water Use = (Population) * (Water Usage Rate)
[1]Residential wastewater flow rate: 68 gallons/day/capita; assume 90 percent of water usage becomes wastewater (Metcalf and Eddy, 2016).

Source: Adapted from LACO 2023b

As shown in Table 3.18i, above, the Project is projected to require approximately 186,402 GPD (0.57 AF), or 68,036,584 gallons (209 AF) per year. As the City currently produces an average of 867 AF of water per year, it is anticipated that the City would produce approximately 1,076 AF per year with the development anticipated in the Project. As noted in Table 3.18c, the City's theoretical water supply is 4,317 AF. If the projected development were to occur, the projected water usage would equate to approximately 25 percent of the City's theoretical water supply. Therefore, the City has sufficient water supply to serve the City's current and projected water demand.

The following existing and proposed policies in the General Plan would help to ensure the City would have sufficient water to serve potential development:

- **LU-1.1 Planning Area:** The Planning Area shown in Figure 3.0-1 includes lands around the City where future land use changes could affect the City of Willits. Mapping showing the planning area boundary shall be provided by the City to Mendocino County and the Local Agency Formation Commission (LAFCo) with a request that all land use and development applications received by the County and LAFCo be referred to the City for review and comment. Encourage the County to implement measures to protect the watersheds and groundwater recharge areas within the Planning Area. (*Source: New Policy*)
- **LU-2.2 Infill Development:** Land within areas of the City served by utilities, transportation infrastructure, and municipal services represent the best opportunity to support affordable housing and employment development, and to reduce greenhouse emissions. Encourage incremental development of vacant and underutilized infill areas that is appropriately scaled and enhances existing neighborhoods within the City. (*Source: Existing Policy 1.230, modified*)

Based on the City's current water supplies and compliance with existing and proposed policies in the General Plan, the impact would be less than significant.

MITIGATION MEASURES

No mitigation measures would be required.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant without mitigation.

Impact UTL-03: Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

The wastewater generation calculations for the development facilitated by the project are based on the estimated water demand described above under Impact UTL-02. Water demand is assumed to be 120 percent of wastewater generation, due to evaporation and system losses. As explained in Impact UTL-02, the water demand that was calculated for this project in this analysis is a conservative estimate based on a maximum buildout scenario. The wastewater generation calculation is based on this conservative estimate. As such, the estimated wastewater calculation is also a conservative estimate and actual wastewater generations from population growth that occurs during the planning period may be lower than what is described in this analysis.

Table 3.18j, below, shows the projected wastewater in GPD that would be generated by the Land Use Change Areas and SOI Area. Table 9 includes assumptions on increases of residents and employees as described in Section 2.0 of this Infrastructure Assessment in Appendix F.

Table 3.18i, above, shows the projected water demand that would be generated by the Land Use Change Areas and SOI Area in gallons per day (GPD). This table is based on the analysis provided in the Infrastructure Assessment in Appendix F (LACO 2023b) but is specific to the projected population of 7,500 persons. The water usage rates from the Infrastructure Report were utilized but the assumption for the projected population is specific to this Draft PEIR. Assuming the current population of the City is 5,008 persons (LACO 2023b), the Project is planning for approximately 2,492 persons in the planning period, or 2043.

Table 3.18j Projected Wastewater Flows

Planning Period	Population (persons)	Wastewater Flow Rate (gallons/day/capita)	Total Projected Wastewater Flow (GPD)
Planned for in Draft PEIR	2,492	68 [2]	169,456
Notes: Total Projected Wastewater Flow = (Population) * (Wastewater Flow Rate) [1]Residential wastewater flow rate: 68 gallons/day/capita (Metcalf and Eddy 2016).			

Source: Adapted from LACO 2023b

Table 3.18, above, shows that projected wastewater flow from the potential development is projected to be 169,456 GPD. With the City's current contribution of an average of 390,000 GPD, or 0.39 MGD of wastewater to the inflow of the City's WWTP, it is anticipated that the City would contribute a total of approximately 559,456 GPD, or 0.56 MGD, if the development analyzed in this report were to occur. As the City's share of the WWTP ADFW treatment capacity is 0.64 MGD, the City's would have adequate capacity to provide wastewater services to the projected population under the Project. A less than significant impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Impact UTL-04: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Implementation of the Project would be anticipated to generate additional solid waste. Construction facilitated by the Project would create construction debris, such as scrap lumber and flooring materials. Operation of land uses within development facilitated by the Project would create typical household wastes associated with residential and commercial uses. Industrial development facilitated by the project would also generate solid waste. Although the Project may facilitate development that would generate solid waste, it would not be in excess of state or local standards or the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

As described in Section 5.1, Solid Waste and Recycling, solid waste generated throughout the County is exported to the Potrero Hills Landfill in Solano County for disposal. The Potrero Hills Landfill has a

maximum permitted throughput of 4,330 tons per day and a remaining capacity of 13.872 million cubic yards. The landfill is anticipated to remain open until February 14, 2048 (CalRecycle 2019). The City has an Agreement with SWOW for solid waste collection, transportation, disposal, and recycling for the City and surrounding areas. Within the area covered by the Agreement (2015), SWOW is generally responsible for collecting solid waste, mixed organic waste, and recyclable materials; transporting collecting materials to the appropriate disposal/processing site; processing recycling materials; collecting demolition and construction debris; and operating a recyclable material buy-back center. Curbside pickup for both garbage and recycling occurs Monday through Friday depending on the location within the City and surrounding area.

The Project Area is currently served by SWOW, and this would not change under the proposed Project, unless the City were to modify its agreement with SWOW or otherwise enter into a new contract. No new land uses are proposed under the Project that are atypical and incompatible with existing land uses within the City, nor that would be expected to generate solid waste in excess of current land uses within Willits. The impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Impact UTL-05: Would the Project comply with federal, state, and local management and reduction statutes and regulation related to solid waste?

As stated previously, the Project Area is currently served by SWOW and is required to comply with federal, state, and local management regulation related to solid waste. This would not change under the Project, only additional potential development may occur, in line with existing development. Furthermore, new development pursuant to the proposed Project would need to comply with Division 4.4 of the 2022 CALGreen Building Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from residential and nonresidential construction operations be recycled and/or salvaged for reuse. New development and redevelopment would also need to comply with the requirements of AB 341 that mandates recycling for commercial and multifamily residential land uses. Therefore, solid waste facilities would be able to accommodate project-generated solid waste, and impacts would be less than significant.

Additionally, Goal 6.100 and Policies 6.210 and 6.220, of the General Plan Public Services and Facilities, Parks and Recreation Element require local planning and development decisions to minimize impacts related to public services, which serve to minimize potential adverse impacts on solid waste generation.

With continued compliance with the applicable regulations, leading to increased recycling and waste diversion, and adherence to the proposed General Plan goals, policies, and actions, anticipated rates of solid waste disposal from the proposed project would be less than significant with respect to permitted landfill capacity. Therefore, the impact is less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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Acronyms/Abbreviations

AF	Acre-feet
BTCSD	Brooktrails Township Community Services District
CEC	California Energy Commission
CPUC	California Public Utilities Commission
County	County of Mendocino
ERW	Elias Replacement Well
FCC	Federal Communications Commission
FEMA	Federal Emergency Management Agency
GPM	gallons per minute
GWTP	Groundwater Treatment Plant
HDPE	high-density polyethylene
Hp	horsepower
LAFCo	Local Agency Formation Commission
LEA	Local Enforcement Agency
Meadowbrook	Meadowbrook Manor County Sanitation District

EH	Mendocino County Division of Environmental Health
MendoRecycle	Mendocino Solid Waste Management Authority
MG	million gallons
MGD	million gallons per day
MGM	million gallons per month
MS4	municipal separate storm sewer system
NPDES	National Pollutant Discharge Elimination System
OAS	out-of-agency services
PG&E	Pacific Gas and Electric
PVC	Polyvinyl Chloride
Regional Board	Regional Water Quality Control Boards
SDWA	Safe Drinking Water Act
SFR	single-family residential
SOI	Sphere of Influence
SWOW	Solid Wastes of Willits, Inc.
SWRCB	State Water Resources Control Board
UV	ultraviolet
EPA	United States Environmental Protection Agency
WWTP	wastewater treatment plant
WTP	Water Treatment Plant

3.19 WILDFIRE

This section summarizes the wildfire risks in and near the Planning Area and analyzes the impacts related to wildfire risks due to the project. This section incorporates information and analysis from the 2021 Mendocino County Multi-Jurisdictional Hazard Mitigation Plan, 2020 Mendocino County Fire Vulnerability Assessment, 2020 Mendocino County Evacuation Plan, 2019 Willits Safety Element Draft, 2016 Mendocino Multi-District Fire Protection Services Municipal Service Review (MSR), and the 2010/2005 Mendocino County Community Wildfire Protection Plan.

ENVIRONMENTAL SETTING

A. DEFINITIONS

Aspect – Aspect is the direction that a slope faces, and it determines how much radiated heat the slope will receive from the sun.

Disturbances – Various activities that disrupt the normal state of the soil, such as digging, erosion, compaction by heavy equipment, etc.

Fire Hazard – A fire hazard is a description of the fuels available to burn in a given area and how they could burn. It considers topography and fuel complex which determines the degree of ease of ignition and of resistance to control. It can be influenced by past disturbances or management activities that alter the hazard for better or worse, including changing the site moisture. It is also affected by the volume and spatial arrangement of fuels.

Fire Hazard Severity Zone – Determined by CalFire, the classification of a fire hazard severity zone (FHSZ) as Moderate, High, or Very High fire hazard is based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. Zone boundaries and hazard levels are determined based on vegetation. For wildland areas, the current FHSZ model uses burn probability and expected fire behavior based on weather, fuel, and terrain conditions. For urban areas, zone boundaries and hazard levels are based on vegetation density, adjacent wildland FHSZ scores, and distance from wildlands. Each area of the map gets a score for flame length, embers, and the likelihood of the area burning. Scores are then averaged over the zone areas.

Fire Regime – Fire regime is a description of fire's historic natural occurrence, variability, and influence on vegetation dynamics in the landscape. The five historical fire regimes are classified based on the average number of years between fires (fire frequency) combined with the fire severity (amount of consumption of the dominant overstory vegetation). The difference in fire regime between pre- and post-European settlement is described by the condition class, or the degree of departure from the historical natural fire regime.

Fire-Return Interval – A Fire Return Interval (FRI) is the number of years between two successive fire events for a given area. Also referred to as fire interval or fire-free interval.

Fire Risk – The combination of vegetation, topography, weather, ignition sources, and fire history that leads to fire and/or ignition potential and danger in a given area.

Fuel Complex – The volume, type, condition, arrangement, and location of fuels.

Intermix – Intermix refers to the situation where structures and vegetation (wildland) are closely intermingled or interwoven.

Jet Stream – The high-altitude air current guiding weather systems.

Local Responsibility Area (LRA) – The area in the state that is not State or Federal Responsibility Area where the financial responsibility of preventing and suppressing fires primarily rests on the local jurisdiction. Lands within the exterior boundaries of a city are LRA.

Perturbance – In the context of ecosystems and wildfires, perturbance typically refers to a disturbance event that affects the structure and composition of the ecosystem. The process by which a stand-replacing fire event removes above-ground vegetation but allows for the below-ground material to remain intact, enabling sprouting and the rapid recolonization of the ecosystem immediately following the fire.

Stand-replacing Fire – A fire that kills most or all of the trees in a section of forest.

State Responsibility Area (SRA) – The area in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires, which does not include lands within the exterior boundaries of a city. No state regulations apply in LRA areas unless within a Very High Fire Hazard Zone.

Wildfire – Wildfires differ from other fires in that they take place in areas of grassland, woodlands, brushland, scrubland, peatland, and other wooded areas that act as a source of fuel, or combustible material. Buildings may become involved if a wildfire spreads to adjacent communities. The primary factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions. The Office of Planning and Research has recognized that although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access. Fire frequency also tends to be highest at low to intermediate housing density, at least in regions where humans are the primary cause of ignitions (California Natural Resources Agency 2018).

Wildland-Urban Interface – The wildland-urban interface (WUI) is the zone where human-made structures and infrastructure are in or near areas prone to wildfires. When these structures are intermixed with natural vegetation, it increases the risk of wildfires impacting homes and communities. CAL FIRE defines WUI as areas where human (development) encroaches into natural areas considered as areas with a high and very high FHSZ.

Wind Vector – Wind vector refers to the direction and speed of wind flow in a specific area. It is an important parameter to consider when assessing potential environmental impacts of a project, particularly for issues related to air quality, dispersion of pollutants, and potential effects on vegetation and wildlife. Understanding the wind vector helps in evaluating how wind patterns may influence the dispersion of emissions and the overall environmental conditions in a project's vicinity.

B. Wildfire Conditions

Mendocino County, including Willits, has a long wildfire history. However, properties within City boundaries have not been directly impacted by a wildfire since the Ironies #2 Fire in 1944 and the Planning Area was last directly impacted by wildfire in 1950 by the Strong Mountain Fire (Mendocino County, 2020). In recent years, wildfire conditions have worsened resulting in severe impacts elsewhere Mendocino County. Most notable large fires in the surrounding area include the August Complex fire in 2020 and the deadly Redwood Complex Fire in 2017 which will be further detailed below. Smaller fires have also affected the City in the last couple years including the Oak Fire which caused damage north of Willits in 2020 and the much smaller Walker fire just south of Willits in 2022.

The August Complex is the largest in California history and was the result of several fires merging into one “gigafire” to burn a total of 1,032,648 acres (CalFire, 2020). The fire was finally contained 87 days after it started and stopped less than 30 km northeast of the Planning Area. While the primary impact of the August Complex Fire was felt in other parts of Mendocino and Trinity Counties, the City of Willits also faced significant effects. Willits experienced poor air quality due to smoke and ash from the fire, leading to health concerns for its residents. Additionally, the fire caused road closures and evacuations in the surrounding areas, affecting transportation and creating challenges for the City. The August Complex Fire highlighted the ongoing threat of wildfires in California and their potential to impact communities, even if they are not directly in the path of the flames.

The Redwood Complex Fire came much closer to the City of Willits, with properties and lives lost reportedly less than ten miles to the southeast of the City. This fire was also the result of multiple fires merging: the Potter Valley and Redwood Valley fires. The fire ultimately lasted for 21 days due to a variety of factors including steep terrain, fuel moistures, northwest winds, and limited resources during a busy fire season in Northern California (Fire Vulnerability Assessment For Mendocino County, 2020). During this time there were several large-scale evacuations and the closure of major highways and local roadways associated with the other fires burning at the time. The Redwood Fire itself caused the closure of Route 101 between Willits and Ukiah as the fire rapidly spread on both sides of the highway. Although 101 was only closed to two-way traffic for a couple days, the fire had caused more than $5,000,000 worth of damage to critical elements of the roadway and required ongoing traffic control, restrictions, and closure of the southbound #2 lane. Repairs to Route 101 included removal of 75 hazardous trees, 27,000 feet of metal beam guard rails, 2300 feet fencing, 10 drainage systems, clogged ditches, and unstable and denuded slopes in addition to other roadway impacts (Fire Vulnerability Assessment For Mendocino County, 2020). Overall, the Redwood Complex Fire burned 36,523 acres, destroyed 545 structures, and badly damaged a further 43 structures (Maxwell, 2023). The impact on human life was particularly significant. Approximately 8,000 people were forced to evacuate the area, 20 people were hospitalized with severe burns, and most tragically, the fire caused the death of nine people ranging in age from 14-88.

Slope and Aspect

Sloping terrain increases a community’s vulnerability to wildfires due to several factors of which include speed of wildfire spread on steep slopes and the difficulty steep slopes pose to firefighting efforts (Cal Fire 2000). Furthermore, after severe wildfires, sloping land is at a higher risk of landslides and flooding, particularly during heavy precipitation events caused by increased runoff. The aspect of a slope can influence factors like sunlight exposure, vegetation types, and microclimates in the area. South to southwest-facing slopes, for instance, receive the most solar radiation which results in warmer and drier vegetation compared to slopes facing north to northeast. This increased aridity heightens the potential for wildfire ignition and rapid propagation (Cal Fire 2000).

The area around Willits has a diverse topography characterized by widely varying slopes ranging from gentle to steep grades. The City is located within relatively flat land in the Little Lake Valley at an elevation of approximately 1,372 feet (418 meters) above sea level. It is surrounded by slopes that becomes more pronounced as one moves away from the valley towards the encircling hills and mountains. The Coastal Range to the west of Willits features particularly rugged and steep slopes in some areas. The topography within 2 miles of Willits contains very significant variations in elevation, with a maximum elevation change of 932 feet and an average elevation of 1,476 feet above sea level (Weather Spark, 2023). Within 10 miles there are very significant variations in elevation (3,064 feet) and within 50 miles there are even more significant variations in elevation (7,556 feet).

The aspect of slopes around Willits can vary depending on their location. For example, the slopes of the Coastal Range to the west primarily face westward towards the Pacific Ocean. In contrast, slopes on the eastern side of the City face eastward and in other directions. The main ridges for the whole County are oriented north-northwest to south-southeast (Mendocino Fire Safe Council, 2015).

Vegetation

Vegetation is the primary fuel source for wildfires. Vegetation and their wildfire potential changes over time with seasonal growth, die-back, and other factors such as spread of plant diseases and introduced plant pests. The interplay between vegetation and wildfires is complex, with plants naturally possessing a spectrum of fire susceptibility from fire resistant to highly flammable. Some plant types in California have even evolved a dependency on fire for seed germination cycles.

Wildfire dynamics hinge on the nature of fuels present, categorized into ladder fuels, surface fuels, and aerial fuels. Ladder fuels create a pathway for surface fires to ascend into the crowns of trees. Surface fuels include grasses, logs, and low-lying stumps, while aerial fuels encompass limbs, foliage, and branches not in direct contact with the ground (Cal Fire, 2022). Understanding these distinctions is pivotal in comprehending wildfire behavior and formulating effective mitigation strategies. Weather and climate conditions, which will be detailed further in the next subsection, influence moisture content of vegetation and can in turn increase vegetation's flammability and fuel type.

Vegetation fuel types in the Project Area are primarily located around the outskirts of City boundaries and consist of a mosaic of grass, oak woodlands, brush, and mixed chaparral with areas of heavy timber in the higher elevations (Fire Vulnerability Assessment For Mendocino County, 2020). Many of the trees in the forested areas surrounding the City have been historically timber harvested and are now matured. Immediately northwest of Willits, and in close proximity to the airport, which is a part of the City's jurisdiction, is the unincorporated community of Brooktrails Township. Brooktrails Township consists of the Brooktrails subdivision and the Redwood Park. This steep and heavily wooded region holds the unique distinction of being the first community in the United States to integrate a four-square mile conservation park featuring redwood and mixed-growth redwood forests with a fully developed residential subdivision. Some vegetation management and wildfires have reduced the fuel load in the areas around the City and Brooktrails Township, however, many areas have not and consequently there are locations with a build-up of readily burnable wildland fuels. The mountains and foothills surrounding Willits and Brooktrails Township have a significant wildland interface and pose an intermix challenge. Table 3.19a below shows a breakdown of vegetation type surrounding the City.

Table 3.19a: Land Cover Estimates by Vegetation Type in Proximity to the City of Willits

Vegetation Type	Approximate Percent Land Cover in Surrounding Area		
	Within 2 miles	Within 10 miles	Within 50 miles
Shrubs	47%	42%	36%
Grassland	26%	-	-
Cropland	21%	-	-
Trees	-	50%	31%

Source: (Weather Spark, 2023).

Vegetation types influence the fire regimes that exist in an area. There are several US Forest Service Fire regime models applicable in the Project Area of which include: California Oak Woodlands, Chaparral, California Grassland, and Coast Redwood. Brief descriptions of these fire regimes and their disturbance patterns are provided below.

Oak Woodlands: Oak woodlands feature a canopy predominantly composed of deciduous hardwood species, resulting in a dominance of herbaceous surface fuels that significantly influence fire dynamics. The prevailing fire regime in these woodlands involves frequent, low-severity fires, which are likely to contribute positively to the productivity of the overstory and enhance the resilience of the canopy to fire-induced damage. Occasionally, isolated stand replacement fires create openings in the landscape, leading to the formation of grasslands. These areas require patch-gap recruitment and edge recolonization over time (USDA, US Forest Service, 2005). The presence of grass fuels permits very frequent fires, potentially occurring annually, with the fire regime strongly influenced by historical indigenous ignition practices. The recruitment of oaks in the absence of fire appears to be slow, and various disturbances, both biotic and abiotic, play a role in shaping the life history of these trees. Under grazing conditions, the growth form of oak seedlings/saplings may become more prostrate, rendering them more susceptible to foliar combustion and direct fire-related mortality. In plant communities where tanoak historically dominated or was a significant component, mixed-severity fires were prevalent, typically occurring in the summer or early fall (USDA, US Forest Service, 2023). The conifer/tanoak types, in particular, are often in a late successional stage due to fire exclusion, with tanoak thriving over less shade-tolerant species in these conditions.

Chaparral: Chaparral is characterized by the presence of woody, sclerophyllous shrubs, typically ranging from 3 to 15 feet in height. The shrub cover tends to be dense and continuous, spanning extensive areas of land. Chaparral ecosystems often undergo stand-replacing fire events, which result in the removal of above-ground vegetation. Despite this, the below-ground material typically remains intact, allowing for post-fire sprouting and rapid recolonization of the stand. Due to this perturbance, stand-replacing fires are more prevalent in the shrub-dominated stages and surface fires are important in later seral closed stages that are dominated by conifers. FRI in chaparral is generally greater than that in surrounding forested landscapes, potentially double, owing to the reduced flammability of many young shrub fields with a limited history of fuel accumulation (USDA, US FIre Service, 2005).

California Grasslands: California's grasslands exhibit a diverse array of dominant cover types, comprising both annual and perennial grasses and forb species. Grassland fire regimes in California, including Northern California, have historically been influenced by a combination of natural factors and human activities. Native Americans used controlled burns for various purposes, affecting the fire frequency and intensity in grasslands. With historical Native American resource management, grasslands experienced burning at frequencies as high as every 1-3 years. In the absence of traditional indigenous burning patterns, FRI ranged from 10-30 years. However, in areas where natural and human-caused ignitions were infrequent, these intervals could be much longer (USDA, US Forest Service, 2005).

Coast Redwood: Redwood forests commonly experienced moderate-intensity surface fires during the summer and early fall. These fires would consume irregular patches of surface fuel and understory vegetation. The towering canopy's considerable height and the separation between surface and crown fuels created a pattern where fires seldom led to canopy tree mortality. The fire intervals in redwood forests varied widely, ranging from less than 10 years in interior and upland areas to over 100 years on lower slopes near the coast (USDA, US Forest Service, 2005).

Vegetation cover in the Project Area is more thoroughly described in Section 4.4, Biological Resources.

Weather and Atmospheric Conditions

Surface wind, temperature, relative humidity, and drought collectively exert the most significant impact on fire behavior and vulnerability. In conditions of high temperature, low humidity, and strong winds, fires gain speed and intensity. The wind not only accelerates the spread but can also carry embers ahead,

further expanding the fire perimeter. Prolonged drought intensifies the risk by fostering extended periods of excessively dry vegetation, elevating both the amount of available fuel and the likelihood of ignition (National Wildfire Coordinating Group, 2023).

The area inland of the California north coastal strip benefits from the seasonal onshore marine push which usually keeps overnight relative humidity high during normal patterns. Occasionally interior high pressure does develop in Mendocino County and creates critical burning conditions. When interior high pressure conditions develop, producing hot, dry north/northeast offshore winds, there is abundant potential for severe fires in the Willits area. These critical weather patterns typically develop four to five times each fire season. Each pattern usually builds and dissipates within several days.

According to the National Oceanic and Atmospheric Administration (NOAA), most precipitation within the state is received from November through March, with an average annual rainfall of approximately 18 inches (NOAA 2022). May through September is the driest time of the year and coincides with what has traditionally been considered the fire season in California. However, increasingly persistent drought and climatic changes in California have resulted in drier winters, and fires during the autumn, winter, and spring months are becoming more common (NOAA, 2023).

For Willits, the climate exhibits warm, arid summers with mostly clear skies. This transforms into cold, wet winters with partial cloud cover. Throughout the year, temperatures typically range between 35°F and 85°F, seldom dipping below 27°F or rising above 94°F (Weather Spark, 2023). The hot season spans roughly 3.2 months from June until September with an average daily high temperature above 79°F. July stands out as the hottest month, boasting an average high of 84°F and a low of 53°F. The cool season lasts for about 3.3 months from November to February with an average daily high temperature below 58°F. December marks the coldest month, featuring an average low of 36°F and a high of 52°F.

Willits exhibits pronounced seasonal variation in monthly rainfall with an average of approximately 50 inches a year and an average of 3.6 inches of snow annually (Mendocino County, 2020). The rainy phase spans 8.8 months, extending from September to June, during which the sliding 31-day rainfall measures at least 0.5 inches. December emerges as the wettest month in Willits, boasting an average rainfall of 7.2 inches (Weather Spark, 2023). The likelihood of encountering wet days exhibits significant variation across the seasons as well. The wetter period spans 5.8 months, ranging from October to April, where there is a greater than 19% chance of any given day being a wet day (Weather Spark, 2023). February emerges as the month with the highest frequency of wet days, averaging 10.1 days with at least 0.04 inches of precipitation. The mountains surrounding Willits will also accumulate considerable amounts of rainfall and snow, up to 100 inches of rainfall in some locations (Mendocino County, 2020).The drier season extends for 6.2 months, encompassing April to October. August stands out as the month with the fewest wet days in Willits, recording an average of only 0.3 days with at least 0.04 inches of precipitation. Within that time period, there was less rainfall for 3.2 months from June to September. The month with the least rain in Willits is August, recording an average rainfall of 0.1 inches (Weather Spark, 2023).

The local wind conditions at any given location are tied to the surrounding topography and various influencing factors, resulting in a broader range of instantaneous wind speed and direction compared to hourly averages. The prevailing winds reported here are derived from the wide-area hourly average wind vector at 10 meters above the ground in Willits. Throughout the year, Willits experiences mild seasonal variations in the average hourly wind speed. The windier phase spans 7.7 months, lasting from November to July, characterized by average wind speeds exceeding 5.0 miles per hour. May stands out as the windiest month, registering an average hourly wind speed of 5.5 miles per hour. The calmer period endures for 4.3 months, from July 6 to November 16, with August identified as the calmest month,

featuring an average hourly wind speed of 4.4 miles per hour (Weather Spark, 2023). The predominant average hourly wind direction in Willits undergoes seasonal shifts as well. The westward wind prevails for 3.9 weeks, from July to August, reaching its peak percentage of 45% in July. From August to July, the north wind becomes most common for the majority of the year, peaking at 34% in January (Weather Spark, 2023).

During the summer, the region around Willits is prone to experiencing robust and unpredictable winds (Mendocino County, 2020). As the interior valleys such as the Little Lake Valley heat up, the ascent of warm air prompts a flow of cool air from the Pacific Ocean towards the east. This phenomenon contributes to heightened and erratic wind patterns in the coastal drainages. In the fall, the jet stream will occasionally plunge south from Alaska and Canada into the mountainous west. This sets the stage for low pressure to form over the Great Basin, creating an atmospheric pressure differential which generates strong winds from the pressure change over a relatively short distance. These winds, descending after traversing mountain peaks, critically dry out the air. When this ultra-dry air overlays arid vegetation, it creates tinderbox conditions conducive to extreme fire growth. Demonstrating the potency of this meteorological phenomenon, wind gusts surpassing hurricane force have been documented in various locations within the region. Wildfires during these wind events pose an exceptionally dangerous and destructive threat.

Postfire Impacts

The aftermath of wildfires can yield catastrophic indirect effects. Beyond the immediate devastation of vegetation loss and the destruction of forest resources, large and intense fires can inflict lasting harm on the soil, waterways, and the overall landscape. Soil exposed to intense heat may lose its ability to retain moisture and sustain life, leading to rapid erosion and increased siltation in rivers and streams. This escalation of sedimentation heightens flood potential, poses risks to aquatic life, and degrades water quality. Furthermore, landscapes stripped of vegetation become more susceptible to debris flow hazards.

The impacts of wildfires on watersheds are profound, resulting in both immediate challenges and enduring consequences. Erosion and runoff rates escalate to perilous levels in the aftermath of California wildfires. Typically, trees, shrubs, grass, and protective groundcover mitigate soil detachment and facilitate rainfall infiltration. However, the extreme heat generated by wildfires can bake the soil to a point where water penetration is hindered, causing excessive runoff in post-wildfire areas.

In the aftermath of the Redwood Complex Fire, the surrounding area underwent assessment by the Watershed Emergency Response Team (WERT), comprising geologists, engineers, hydrologists, and foresters (Walkup, Melodia, Kelly, Schoenberger, 2023). Their evaluation revealed potential hazards to life and safety in the area, including heightened stream flows, increased erosion and sediment delivery, and the likelihood of debris flows. WERT expressed concern for individuals residing or traveling within the mapped floodplain or downslope of potential mudslides, recommending a move to safer areas before, during, and after periods of high-intensity rainfall.

C. Wildfire Hazards

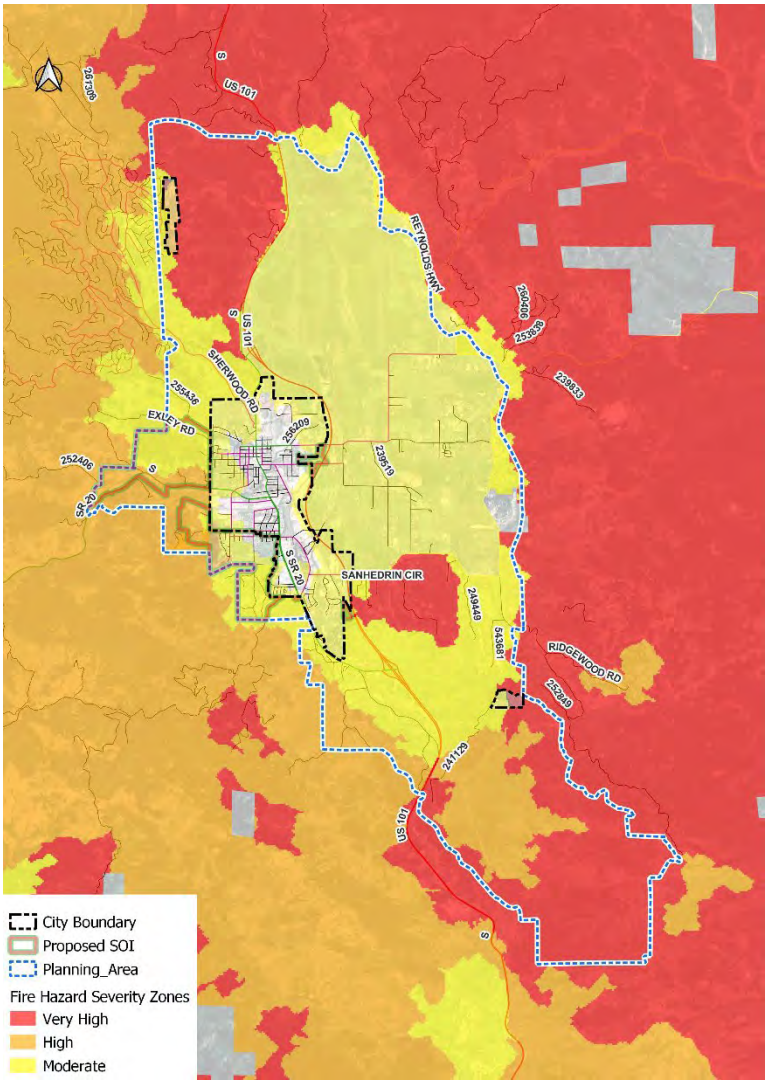
In California, the responsibility for wildfire prevention and suppression is a shared effort among federal, state, and local agencies. Federal agencies oversee federal lands in Federal Responsibility Areas, while the State of California designates certain non-federal lands in unincorporated areas with watershed significance as State Responsibility Areas (SRA), managed by CAL FIRE. Incorporated areas and certain other unincorporated lands fall under Local Responsibility Areas (LRA).

Though nearly all of California faces some degree of wildfire hazard, specific features make certain areas more susceptible. CAL FIRE, mandated by law, maps areas of significant fire hazards based on factors

such as fuels, terrain, and weather. This mapping, conducted in zones known as Fire Hazard Severity Zones (FHSZs), distinguishes Moderate, High, and Very High categories. Compliance with specific building and vegetation management requirements is mandated for areas within the Very High FHSZ to mitigate property damage and safeguard lives.

Wildfires are a common type of natural hazard in California and can burn large areas of undeveloped or natural land in a short amount of time. The recent trend toward more prolonged periods of drought increases the likelihood of wildfires occurring. The CAL FIRE Fire Hazard Severity Zone (FHSZ) Viewer designates Willits as part of the WUI, where many areas fall within the Moderate and High FHSZs. The majority of the proposed Sphere of Influence (SOI) Area is within the SRA and classified as within Moderate or High FHSZs. Figure 4.19a shows Fire Hazard Severity Zones in SRA and very high FHSZs in LRA that were effective April 1, 2024 and recommended other FHSZs in LRA from September 2007. There are City critical facilities within the very high FHSZ which include the City's surface water treatment plant and the airport, which is adjacent to a very high FHSZ designated area. The airport serves as a crucial evacuation location and plays a pivotal role in regional CAL FIRE disaster response and recovery during significant wildfires and particularly in the Brooktrails area.

Figure 4.19a: Willits Planning Area Fire Hazard Severity Zones (2024)



The Mendocino County Multi-Hazard Mitigation Plan identifies that approximately 60% of the City is located within a fire hazard severity zone as mapped by CAL FIRE (Mendocino County, 2021). Areas designated as moderate FHSZ account for approximately 962 acres and are primarily located along the City boundary. Areas designated as high and very high FHSZ account for 81 acres north of the City at the airport and 17 acres south of the City at the Morris Dam. The multi-jurisdictional multi-hazard mitigation plan reports excessive fuels may exist around City facilities and roads such as the airport which serves as an emergency evacuation area (Mendocino County, 2021). Approximately 2,845 people in the City of Willits live in a high or very high wildfire severity zone (Mendocino County, 2021). The Multi-Hazard Mitigation Plan also identified eight schools, four residential care facilities, the City's wastewater treatment facility, three City bridges, Frank Howard Memorial Hospital, and one child care center as critical infrastructure located in high or very high FHSZ.

The most significant risk of human-caused fires in the region arises from the urban interface to the west, as well as public activities within the Forest, including traffic along Highway 20, campfires, firearm use, firewood collection, and fireworks. Additional sources of potential ignition encompass logging equipment and the PG&E transmission line, which runs roughly parallel to Highway 20 between Willits and Fort Bragg (Cal Fire, 2022).

In a concerted effort to safeguard individuals and their properties from the potential devastation of wildfires, the National Fire Plan allocates funding for projects aimed at mitigating fire risks to communities. A pivotal stride toward this objective involved pinpointing communities facing a high risk of wildfire damage. These high-risk communities, situated within the wildland-urban interface where homes and wildlands coalesce, were officially documented in the Federal Register in 2001. As per Congress's request, the Federal Register notice exclusively featured communities adjoining federal lands. This comprehensive list resulted from collaborative efforts among the 50 states and five federal agencies, utilizing a standardized process. States were tasked with submitting all communities within their borders meeting the criteria of structures at high risk from wildfires. Willits was duly recognized as one of the Communities at Risk within the CAL FIRE Mendocino Unit's jurisdiction in 2001.The California Fire Alliance lists Willits as a very high hazard level (Mendocino Fire Safe Council, 2015).

Pre-Fire Management Tactics

The City of Willits is within the Little Lake Fire Protection District (FPD), which is a single-purpose special district that provides full-service community fire protection services, which generally includes fire prevention and suppression, medical/rescue/extrication, and hazardous materials responses (Mendocino LAFCo, 2016). The City of Willits has a fire hydrant grid in town and along the major roads consisting of 298 hydrants. However, in the rural subdivisions there are few or no hydrants. In these areas, the District mainly relies on Little Lake FPD water tenders and people having their own individual water cistern tanks adjacent to their homes which are a required part of the Mendocino County building permit process (Insurance Services Office, 2021). Water for fire protection in portions of Little Lake FPD outside the City is provided by one 4000-gallon water tender, one 2000-gallon tactical water tender, each with portable water tanks, on-board tanks on each engine, and other available water supplies sources such as ponds, creeks, swimming pools, and cisterns from which the Little Lake FPD can draft water. More details on the Fire Protection services provided by the City are discussed in Section 4.16 Public Services.

Willits is located within Cal Fire's Mendocino Unit Battalion II. The Little Lake Valley is basically grassy oak woodlands that transition into brush towards the east, then to timber at the higher elevations. There are many structures intermixed in the area and especially in the Pine Mountain Subdivision to the east of Willits. It has similar features outlined in the Brooktrails scenario, steep winding roads that provide

adequate access during normal conditions but would be hard pressed to accommodate residents evacuating and fire resources entering the area, especially the transport/dozer units responding. The Battalion overlays Willits, the only incorporated city, several unincorporated communities of various sizes, two high schools, and five grade schools. Miles of overhead power lines, a continuing source of vegetation fire starts, accompany ongoing building in the wildland.

CAL FIRE and the Mendocino County Fire Safe Council (MCFSC) have expressed the intention to expand their existing collaboration over the coming years (Cal Fire, 2022). They have already begun a series of road clearing/fuel break creation projects aimed at corridors on which ingress and egress may be particularly critical in a wildfire situation. In 2020 substantial projects were managed by the MCFSC in Brooktrails. Those efforts proved to be thorough, on time and under budget so CAL FIRE and the MCFSC continued the project of identifying key ingress/egress routes throughout the county that would benefit from CAL FIRE and MCFSC collaboration in implementing treatment (Cal Fire, 2022; CAL FIRE, 2023). Several projects are called out in the individual Battalion work plans of which include:

- Sherwood Road exit corridor through Brooktrails Township
- Brooktrails Community Greenbelt
- Ridgewood Road - Pine Mountain Subdivision - east of Willits
- Williams Ranch Road - Black Bart Subdivision south of Willits

The Willits Fuel Reduction Project focuses on the densely populated area north of Willits, designated as a WUI region characterized by narrow roads and challenging ingress/egress, with Brooktrails currently having only one road in and out of the community (CAL FIRE, 2023; Cal Fire, 2022). This area encompasses steep terrain covered by a mix of grasslands, coniferous trees, mature brush, and timberlands. To reduce fire hazards, the project aims to clear understory fuels, brush, and small trees along various roads, incorporating VMP prescribed burns where suitable. The initiative aims to establish a crucial secondary access for this densely populated urban interface area in the County, with the primary goal of enhancing roadways for safe evacuation routes. Additionally, the project seeks to create primary, secondary, and tertiary control lines in preparation for major wildfires originating from the Brooktrails community or Highway 101. The direct impact of this project extends to the communities of Brooktrails, Pine Mountain, and Willits in the Little Lake Valley.

The Brooktrails Fuels Reduction project is an ongoing effort in 2023 performed by the Brooktrails Township in cooperation with Cal Fire (CAL FIRE, 2023; Cal Fire, 2022). The project aims to diminish the risk of significant and destructive fires while fostering overall forest health by implementing thinning of vegetation in various strategic areas throughout the district. An 8.2-mile-long section of roadside from Timber Road to Willits has been completed and establishes an important shaded fuel break and strategic area for suppression forces to anchor into in the event of a westward-coming fire. There are several more fuel reduction efforts in the planning stages (located around e 1st, 2nd, 3rd gate, and Middle Road) (CAL FIRE, 2023).

The Howard Forest Fuels Reduction project is also ongoing in 2023 (CAL FIRE, 2023). The project encompasses approximately 129 acres south of Willits at the Mendocino CAL FIRE Headquarters. This project is strategically situated to serve as a shaded fuel break and fuels reduction project to prevent damage of critical infrastructure, establish alternative escape routes for employees, eliminate hazard trees on the acquired property, and offer training opportunities for CAL FIRE employees and their collaborators.

The Skunk Train Fuel Reduction project is an ongoing effort since a series of fires along the railroad in 2018 (CAL FIRE, 2023). This notably proactive fuel reduction project has created a shaded fuel break and removal of fuels on railroad right of way parallel the Skunk Train Railroad west of Willits. Since then, track maintenance personnel have maintained a robust approach to fuels management, resulting in the absence of significant fires on the tracks since its inception in 2018.

The Golden Rule Fuel Reduction project south of Willits near the City's Planning Area reduced fuel load around the lone entrance and exit to the Golden Rule Trailer Park and Golden Rule Church Association (CAL FIRE, 2023). This project was completed in 2022 and has entered into maintenance status.

There are pre-fire plans in the development stage for the Brooktrails/Sylvandale/Spring Creek, Ridgewood, Pine Mountain, and String Creek/Tar-Tar Canyon areas. Personnel from Battalion II have plans to work closely with their GIS Specialists, Brooktrails and Little Lake Fire Departments, and the Fire Safe Councils that have influence in the areas, to complete these plans in 2023 and 2024 (CAL FIRE, 2023).

Climate Change Considerations

While climate change isn't a hazard, fluctuations in environmental conditions can influence some of the natural hazards affecting Willits. Future projections anticipate rising temperatures, an increase in extreme heat days, higher precipitation levels, more intense rainfall events, extended drought periods, elevated incidents and severity of wildfires, and prolonged power outages. The environmental changes could change local vegetation, impact local drainages, and exacerbate the need for wildfire management activities. A summary of potential climate change impact to Willits as identified by the City's Draft Safety Element is detailed in Table 3.19b below.

Table 3.19b: Potential Climate Change Impacts on Willits Current Weather and Climate Conditions

Potential Effects	Historic or Current	Future
Annual Mean	69.4° F (1961-1990)	73.2-76.3° F (2070-2099)
Extreme Heat Days	4 days per year (Current)	15-30 days per year
Annual Mean Precipitation	51.9 inches (Current)	55.3-60.6 inches

Source: (CIty of Willits, 2019)

The Willits Draft Safety Element identifies increased rainfall as a hazard to parts of the community that already experience flooding and potentially new areas of the community that have not historically experienced flooding. This is particularly true at the City's wastewater treatment plant which is one of the most vulnerable flooding locations due to historical flooding patterns and is susceptible to increased flooding with increased precipitation. Increased precipitation in frequency and intensity also has the potential to destabilize hillsides and drainages, leading to a higher occurrence of landslides/mudslides and erosion along stream courses. This, in turn, could impact neighboring properties and structures.

Another potential side effect of increased precipitation in Willits is an increase in vegetation growth which could alter vegetation density and the prevalence of dominant plant species. Shifts in vegetation patterns have the potential to escalate the risk of future wildfire incidents.

Precipitation increases within the area will lead to increased amounts of vegetation growth and changes to vegetation density and potential changes to dominant plant species. These vegetation changes could exacerbate future wildfire incidents. Historically, the Willits region witnesses wildfires covering an average area of around 12.5 hectares annually (CIty of Willits, 2019). However, climate change projections

suggest that this area could nearly double by the end of the century, with an estimated increase ranging between 20.6 and 24.5 hectares.

D. WILDFIRE EVACUATION

In October 2022, the California Attorney General issued guidance aimed at local governments considering the approval of development projects in fire-prone areas with particular focus on wildfire evacuation. The guidance encourages local governments to incorporate measures that minimize the risk of wildfire ignition, improve emergency access, and enhance evacuation plans. It underscores the importance of addressing wildfire risks early in the planning process to prevent future catastrophes. Changes in fire frequency, intensity, and human-caused fires have increased threats to California, resulting in extensive damage and loss of life. Residential developments in wildfire-prone areas, particularly in the wildland-urban interface, can heighten the risk of wildfires and pose safety hazards. More development in these areas may increase the chances of fire ignition and hinder evacuation routes. CEQA mandates the evaluation of environmental impacts in susceptible areas, such as wildfire-prone regions, and requires the adoption of feasible mitigation measures.

Proximity to Hazard

Project placement in the landscape relative to fire history, topography, and wind patterns also influences wildfire risk. Local governments should limit development along steep slopes and amidst rugged terrain to decrease exposure to rapid fire spread and increase accessibility for firefighting.

Willits is one of three major population centers in the county that have a discernable urban-interface boundaries, the other two being Ukiah and Fort Bragg (Mendocino County Fire Safe Council, 2015). The city of Willits is located 20 miles north-northwest of Ukiah on Highway 101 and has a significant wildland urban interface on the west side of the community (Mendocino County, 2020).

According to the Mendocino County Evacuation Plan, which is an annex to the Mendocino County Emergency Operations Plan, the City of Willits could potentially require evacuation for earthquake, flood, hazardous materials, wildfire, and tsunami (Mendocino County, 2020). The draft Safety Element for the City specifically identifies the following as prevalent hazards of concern for the City:

- Presence of an active splay of the Maacama fault transecting the community.
- Northeastern portions of the City located within designated FEMA flood zones.
- Wildfire and landslide hazard zones are located within the surrounding hillside areas of the City.
- Dam inundation potential along drainages and stream courses could impact the community if failure were to occur.
- Impacts associated with changing climate conditions (increased temperatures and wetter and more intense winter storms) could intensify future impacts

Project Density and Location

Project density influences how likely a fire is to start or spread, and how likely it is that the development and its occupants will be in danger when a fire starts. Guidance by the California Attorney General concerning wildfire risks advises local governments to increase housing density and consolidate design, relying on higher density infill developments as much as possible. Communities characterized by low- to intermediate-density uses that are dispersed have increased potential for wildfires to start or spread.

The City of Willits City limits encompass approximately 2.82-square miles (1,804-acres) of land on the western edge of the Little Lake Valley. The City limits include the main City boundary as well as two

island areas away from the main City boundary that include the Ells Field-Willits Municipal Airport and the city water treatment plant adjacent to the Morris Reservoir. Residential land use in Willits is entirely composed of low- to intermediate- density with density ranges of 0-30 units per acre. Table 3.19c below shows more details about land use designations and their distribution within the Project Area. Residential neighborhoods are mainly concentrated in the downtown area. However, there are more dispersed low density residential communities in the western and southern sections of the City.

Table 3.19c: Proposed Willits Land Use Update Land Use Designations and Distribution

Residential Land Use Designations		**Density Range (units/acre)**	**Acres**	**Sub-Total**	**% of Total**
Residential-Low Density	R-L	0 - 15	399.7		23.6%
Residential-Medium Density	R-M	15 - 30	221.0		13.1%
Residential-Suburban	R-S	0 – 0.5	113.3		6.7%
				734.0	***43.4%***
Mixed Use Land Use Designations					
Main Street Mixed Use	DM-U	15 - 30	26.9		1.6%
General Mixed Use	GM-U	15 - 30	23.8		1.4%
				50.7	***3.0%***
Commercial Land Use Designations					
Commercial-General	C-G	N/A	199.8		11.8%
				199.8	***11.8%***
Industrial Land Use Designations					
Industrial-General	M-G	N/A	437.3		25.8%
				437.3	***25.8%***
Resource and Public Land Use Designations					
Agricultural - General	A-G	0 – 0.05	10.5		1%
Open Space - Recreation	O-S	N/A	25.4		1%
Public - Service	P-S	N/A	234.7		14%
				270.6	***16.0%***
Total				***1,692.3***	

Source: Proposed Land Use Element Update, 2023.

Demographics

The demographic characteristics of a community, such as the age, language skills, internet access, presence of young children, vehicle availability, and disabilities, all have a direct impact on how effectively and inclusively a community can respond to wildfire evacuations. These factors must be considered when planning land use and emergency evacuation routes to ensure that all residents can safely and promptly evacuate in emergency situations. Interim guidance by Fehr and Associates identified six demographics categories that could potentially indicate a community is more at risk during a wildfire evacuation than regional or state standards. These are briefly described below:

1. **Senior Citizens Living Alone**: A community with a higher share of senior citizens living alone may face challenges during evacuations, as older individuals may have mobility limitations and require additional assistance to evacuate safely.
2. **Households with Limited English Speakers**: Language barriers can impede effective communication during evacuations. Communities with a significant share of households with

limited English speakers may need to provide multilingual communication and support to ensure everyone understands the evacuation instructions and thus hinder their ability to evacuate effectively.

3. **Limited Internet Access**: Access to information is crucial during wildfire evacuations. Communities with a higher share of households with limited internet access may struggle to receive timely updates and instructions, which can hinder their ability to evacuate effectively.
4. **Households with Young Children**: Communities with a higher share of households with children under 5 years of age may need to consider the specific needs of families with young children during evacuations, such as the availability of childcare and family-friendly evacuation centers. Children under 6 also need more guidance during evacuations and are more susceptible to the harsh physical conditions that could present itself if in close quarters with a wildfire such as smoke inhalation and heat.
5. **Limited Access to Vehicles**: The number of vehicles per household can impact a community's ability to evacuate. Areas with a higher share of households with limited access to vehicles may require alternative transportation options and well-planned evacuation routes.
6. **Population with Disabilities**: Communities with a higher share of individuals with disabilities that hinder their ability to evacuate may require tailored evacuation plans, accessible transportation, and appropriate accommodations to ensure their safety.

According to most recent available data from the Census Bureau, the City of Willits has a higher percentage of its population in housing units living without access to the internet, living with a disability that could limit their ability to evacuate, and living with access to 0-1 vehicles than the County of Mendocino and the state. Most notably, over 50% of housing units in the City have only one vehicle or no vehicle access at all, which is over 20% higher than the County and the State. Compared to the County of Mendocino, the City of Willits has a higher percentage of seniors living alone in housing units. Willits and the County have no reported limited English speakers. Table 3.19d below shows Census Bureau five-year average data for the years 2017-2021 for the City, the County, and the State.

Table 3.19d: Demographic Category Comparison of Willits, Mendocino County, and California by Percent Total of Occupied Housing Units

Category	Willits (City) Estimate % of Total Occupied Housing Units	Mendocino (County) Estimate % of Total Occupied Housing Units	California (State) Estimate % of Total Occupied Housing Units
65+ Living Alone	4.8%	2.8%	9.5%
Limited English Speakers	-	-	0.13%
No Internet Access	22.3%	13.0%	7.38%
Children under 6 years of age	3.5%	4.2%	19.4%
Access to 0-1 vehicles	62.8%	39.6%	36.9%
Disability that may inhibit their ability to evacuate	25.6%	19.0%	10.6%

Note: Data highlighted in gold indicate categories where the City of Willits does not meet or exceed the percent of total occupied housing units for the County or the State.

Source: (U.S. Census Bureau, 2017-2021)

Access and Egress

Understanding wildfire evacuation access and egress factors for Willits are crucial for several reasons, particularly in the context of potential new development. Given the wildfire-prone nature of the region, having effective evacuation routes, the capacity of surrounding roadways, status of existing evacuation plans, and proximity to existing fire services, among other factors is vital for the safety of residents and the protection of property. Understanding wildfire evacuation access and ingress in the area ensures that the city's infrastructure can efficiently handle evacuation needs during a wildfire event, minimizing the risk to human life and enhancing overall community resilience. It ensures that the community is well-prepared to respond to evacuation needs in the face of potential fire emergencies, contributing to the overall safety and well-being of the residents in Willits.

The Mendocino County Evacuation Plan identifies several key evacuation routes encompassing State Highway 20 (also sometimes referred to as Fort Bragg Road), Main Street, US Highway 101, East Commercial Street, and East Hill Road. Highway 101 is a primary evacuation route for the area and is well maintained and has more than adequate carrying capacity in case of evacuation. Although unlikely to overlap with wildfire conditions, it is important to note that in periods of heavy rain parts of 101 have a history of flooding north of Willits in the Little Lake Valley (Mendocino County, 2020).

Also notable is Sherwood Road which serves as a vital evacuation pathway linking Willits to the Brooktrails Township which would facilitate the evacuation of homes in this region. Extending approximately 30 miles from Willits to Laytonville, it is the official evacuation route for Brooktrails and Sherwood Corridor communities. Sherwood Road from Willits to Sherwood School, the roadway is fairly straight but narrow. The road is well paved but quite steep in places and often impassible in the winter, particularly past Sherwood School where it becomes very narrow and windy. The Fort Bragg-Sherwood Road is deemed impractical as a viable secondary egress route, primarily due to its current condition and length (Fire Vulnerability Assessment For Mendocino County, 2020). Similarly, the Mitchel Creek Drive – Gibney Lane Emergency Access Road leading to the Noyo River Boat Basin and RV Park roads often becomes impassable during winter. The Williams Ranch Road, formerly a secondary access route to the Black Bart Subdivision, has undergone significant damage, presenting challenges for repair (Fire Vulnerability Assessment For Mendocino County, 2020). Additionally, the potential use of old logging roads like Mariposa Creek and Old Boy Scout in the Ridgewood Subdivision area as secondary access routes is not feasible due to their considerable length and difficult road conditions.

In the Brooktrails area, numerous nonresidential roads, primarily private, are designated for utility easements, timber haulage, and recreational purposes (Fire Vulnerability Assessment For Mendocino County, 2020). These single-lane, dirt/gravel roads are navigable only in dry conditions. Notably, two roads have received conditional approval for "emergency/public safety vehicle use only": The FirCo Haul Road, spanning 2.25 miles from Poppy Drive to Highway 101, and the Willits Creek Trail (also known as Summer Lake Road or Bates Lane), covering 2 miles from Birch Street in Brooktrails to Mill Creek Drive in Willits. CALFIRE has fuel reduction projects in the pipeline for these routes, funded by Sherwood Firewise.

In case of natural disaster such as wildfire, the Mendocino County Evacuation Plan further specifically provides three area specific pre-identified evacuation zones within Willits and an additional four for the nearby community of Brooktrails whose evacuation routes intersect with the City of Willits. These areas include a list of traffic control points, choke points, and areas of reverse lane flows in case of emergency. Within Willits, there are six intersections where entry would be restricted or denied by traffic control in case of emergency. Depending on the emergency this would mean only individuals who can demonstrate

a critical need are allowed entry or entry is denied when the situation is critical and/or entry could possibly interrupt outbound traffic flow. Brooktrails has one intersection that has been identified that would direct traffic north away from Willits to the Highway 101 bypass in case of emergency. No chokepoints were identified. Table 3.19e below details these intersections. It should be noted the Multi-Jurisdictional Multi-Hazard Mitigation Plan does however identify that The City lacks an alternative evacuation route should Main street be compromised during an emergency.

Table 3.19e: Traffic Control Points for Willits Area Evacuation

Community	Intersection	Restrict or Deny Entry	Chokepoint	Reverse Lane Flows
Willits	CA 20 @ Coast Street	X		
	S Main @ West Valley	X		
	S Main @ West Mendocino	X		
	CA 20 @ Blosser Lane	X		
	Meadowbrook @ Della	X		
	Hillside Drive @ Mill Creek Drive	X		
Brooktrails	S Main @ Sherwood Road	X		X
	Hwy. 101 @ Irvine Lodge/Cherry Creek Road	X		
	Hwy.101 @ Branscomb	X		

Source: (Mendocino County, 2021)

Additional Considerations for Project Wildfire Risk Reduction Measures

The primary emergency notification system for Willits and all of Mendocino County is MendoAlert (County of Mendocino, 2023). This system sends registered users timely emergency alerts and notifications through text messages, phone calls, and emails. Users have the flexibility to register multiple communication methods, such as home phone, cell phone, and email, as well as multiple addresses to enhance the successful delivery of vital messages. The system ensures that alerts and notifications are directed to specific geographic areas, with only registered users in those areas receiving notifications.

Mendocino County integrated MendoAlert with Nixle in 2018, providing users with the option to register for both platforms and receive messages across both systems. Both MendoAlert and Nixle operate on an opt-in basis, requiring residents to sign up to receive alerts and notifications. Nixle, functioning as a secondary notification tool, primarily sends notifications via text messages to cell phones. However, residents who register online may also receive email notifications. It is important to note that the City of Willits currently lacks a redundant communications system, posing a potential life-safety threat for individuals without landlines due to the absence of backup power generation in many cell towers (Mendocino County, 2021).

Should the need arise to evacuate the Emergency Command Center (ECC), CALFIRE is equipped with Altaris CAD and the Vesta 911 phone system accessible on both a laptop computer and cell phones, facilitating remote utilization (CAL FIRE, 2023). Additionally, a mobile radio is available for short-duration operations. In the event of an extended emergency, CAL FIRE has access to a Mobile Communications Center, serving as a backup Emergency Command Center, which can typically be deployed within four hours.

In the event that conventional communication channels such as telephone, cell phones, and the internet become non-operational, the Mendocino Evacuation Plan further identifies that the Mendocino County

Auxiliary Communications Service (MACS) will be activated under the supervision of the Office of Emergency Services (Mendocino County, 2020). Upon receiving notification, MACS personnel will initiate operations in the amateur radio room at the Emergency Operations Center. Volunteer amateur radio operators, directed by the Office of Emergency Services, will be deployed to critical facilities across the county. In the event that conventional communication channels such as telephone, cell phones, and the internet become non-operational, the Mendocino County Auxiliary Communications Service (MACS) will be activated under the supervision of the Office of Emergency Services. Upon receiving notification, MACS personnel will initiate operations in the amateur radio room at the Emergency Operations Center. Volunteer amateur radio operators, directed by the Office of Emergency Services, will be deployed to critical facilities across the county.

In case of emergency evacuation, Mendocino Transit Authority (MTA) has public transit service infrastructure in and around Willits. The Mendocino Multi-Jurisdictional Multi-Hazard Plan identifies the transportation assets associated with MTA's long-distance routes, local fixed routes, and two Dial-A-Ride ADA paratransit services as sufficient and available for evacuation purposes. The majority of MTA's buses are kept in a facility in Ukiah, however, there are two wheelchair capable buses and a wheelchair capable passenger van kept in Willits itself among other areas (Mendocino County, 2020). MTA assets are strategically located away from wildfire-prone areas, eliminating the necessity for the removal of critical transit vehicles in the event of a fire-related emergency. It is important to note that the Mendocino Evacuation Plan advises the deployment of gasoline or diesel-powered vehicles over electric vehicles during evacuations due to considerations of limited batter life and the possibility of encountering challenges such as scarce charging stations during power failures.

The Willits Unified School District also operates buses, and depending on the timeliness of evacuation, the County could also pull from the nine other County School Districts operating buses (Mendocino County, 2020). These transportation assets are more limited in use depending on the time of year and availability of qualified drivers. In the summer, qualified drivers may be difficult to find and during the school year the buses will be needed for transporting school children.

REGULATORY SETTING

FEDERAL

Executive Order 13855

Secretary Order 3372 (Reducing Wildfire Risks on Department of the Interior Land Through Active Management) provides specific directions and timelines to the bureaus in the Department of the Interior that play a role in managing wildland fire as they work to meet the mandates of Executive Order 13855. Executive Order 13855 emphasizes that federal agencies must collaborate with state and local institutions and incorporate active management principles into all land management planning efforts in order to address the challenges of wildland fire. Section 5 of the executive order directs the Secretaries of Interior and Agriculture to jointly develop a Wildfire Strategy in collaboration with Federal, State, tribal, and local partners, by December 31, 2020, that supports local Federal land managers in project decision-making and informs local fire management decisions related to forests, rangelands, and other Federal lands, thereby protecting habitats and communities, and reducing risks to physical infrastructure.

Healthy Forests Restoration Act of 2003

The Healthy Forests Restoration Act of 2003 is a U.S. federal law aimed at reducing wildfire risks and promoting forest health. It grants authorities tools to expedite forest management activities, such as thinning and controlled burns, to mitigate wildfire threats and improve ecosystem resilience. The law emphasizes collaboration between federal, state, and local agencies to address forest management

challenges and protect communities from wildfire hazards. The Act further provides that, in a Community Wildfire Protection Plan, communities themselves may define the sizes and boundaries of their Wildland-Urban Interface areas. Based on local topography, weather, wildland fuels, and other factors, Willits as a community may determine an appropriate distance away from their population centers within which vegetation reduction projects should be undertaken to protect their communities.

The Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 requires a state-level mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: “Standard” and “Enhanced.” States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent is to establish plans for active response to severe wildfires and their impacts on communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

STATE

Forest Practice Act

The California Department of Forestry and Fire Protection (CalFire) enforces the laws that regulate logging on privately owned lands in California. These laws are found in the Forest Protection Act, enacted in 1973 to ensure that logging is done in a manner that preserves and protects fish, wildlife, forests, and streams. Each year CalFire foresters review on average 500 to 1,400 Timber Harvesting Plans (THPs), which are submitted by private landowners and logging companies who want to harvest their trees. The foresters also conduct over 6,500 site inspections each year. The reviews and inspections ensure protection of watersheds and wildlife, as well as renewal of timber resources. Article 8 of the Forest Practice Act requires timber operators to observe fire prevention and control rules and to annually submit a fire suppression resources inventory to CalFire.

California Board of Forestry

The Board of Forestry maintains fire safe road regulations as part of Title 14 of the California Code of Regulations (CCR). This includes requirements for road width, surface treatments, grade, radius, turnarounds, turnouts, structures, driveways, and gate entrances with SRAs. These regulations are intended to ensure safe access for emergency wildland fire equipment and civilian evacuation.

California Fire and Building Codes (2019)

The California Fire Code is Chapter 9 of CCR Title 24. It establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structure, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of substances that may pose a threat to public health and safety. The California Fire Code regulates the use, handling and storage requirements for hazardous materials at fixed facilities. The California Fire Code and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines and specialized equipment. To ensure that these safety measures are met, the California Fire Code employs a permit system based on hazard classification. The provisions of this Code apply to the construction,

alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or appurtenances connected or attached to such building structures throughout California.

More specifically, the Fire Code is included in Title 24 of the CCR. Title 24, part 9, Chapter 7 addresses fire-resistances-rated construction; CBC (Part 2), Chapter 7A addresses materials and construction methods for exterior wildfire exposure; Fire Code Chapter 8 addresses fire related Interior finishes; Fire Code Chapter 9 addresses fire protection systems; and Fire Code Chapter 10 addresses fire related means of egress, including fire apparatus access road width requirements. Fire Code Section 4906 also contains existing regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings located in FHSZs within SRAs and Wildland-Urban Interface (WUI) Fire Areas. This code includes provisions for ignition-resistant construction standards for new buildings.

Wildland-Urban Interface Building Standards
On September 20, 2007, the Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the CCR Title 24, Part 2, known as the 2007 CBC. These codes include provisions for ignition-resistant construction standards in the WUI.

Interface zones are areas with dense housing adjacent to vegetation that can burn and meeting the following criteria:

- Housing density class 2 (one house per 20 acres to one house per 5 acres), 3 (more than one house per 5 acres to one house per acre), or 4 (more than one house per acre)
- In Moderate, High, or Very High Fire Hazard Severity Zone
- Not dominated by wildland vegetation (i.e., lifeform not herbaceous, hardwood, conifer, or shrub)
- Spatially contiguous groups of 30-meter cells1 that are 10 acres and larger

Intermix zones are housing development interspersed in an area dominated by wildland vegetation and must meet the following criteria:

- Not interface
- Housing density class 2
- Housing density class 3 or 4, dominated by wildland vegetation
- In moderate, high, or very high fire hazard severity zone
- Improved parcels only
- Spatially contiguous groups of 30-meter cells 25 acres and larger

Influence zones have wildfire-susceptible vegetation up to 1.5 miles from an interface zone or intermix zone.

California Fire Safe Regulations
California Fire Safe Regulations (Public Resources Code Section 4290), are a set of state regulations, applicable within State Responsibility Area, aimed at reducing the risk of wildfires and promoting fire safety in areas prone to wildfire hazards. It regulates firebreaks, which are created by clearing or removing vegetation in order to prevent or control the spread of fires. They are designed to provide defensible space and fire protection for new construction and ensure adequate emergency access: increased property line setbacks for all applicable construction; on-site water storage for fire protection, driveway/roadway types and specifications based on designated usage; all weather driveway/roadway surfaces being engineered for 75,000 pound vehicles; maximum slope of 16 percent; turnout

requirements; gate requirements and setbacks, parking standards, fuels reduction regulations, etc. The section outlines the legal process for local fire protection agencies to establish, maintain, and enforce firebreaks on private properties when necessary for fire prevention and public safety. It grants these agencies the authority to enter the properties for inspection, maintenance, and construction of firebreaks while adhering to specific guidelines and procedures.

The California Fire Plan

The Strategic Fire Plan for California is the State's road map for reducing the risk of wildfire. The most recent version of the Plan was adopted in January 2019 and directs each Cal Fire Unit to revise and update its locally specific Fire Management Plan (Cal Fire 2018). These plans assess the fire situation within each of the 21 Cal Fire units and six contract counties. These plans address wildfire protection areas, initial attack success, assets and infrastructure at risk, pre-fire management strategies, and accountability within their geographical boundaries.

California Office of Emergency Services

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 for the State to receive Federal funding. The Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

State Emergency Plan

The foundation of California's emergency planning and response is a statewide mutual aid system which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation. The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction, and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all State agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

Section 8568 of the California Government Code, the "California Emergency Services Act," states that "the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the act are further reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies (CalOES 2022). The SEMS incorporates the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and state. CalOES

divides the state into several mutual aid regions. The Planning Area is located in Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Sonoma, Lake, Napa, Marin, Solano, Contra Costa, San Francisco, San Mateo, Alameda, Santa Clara, Santa Cruz, San Benito, and Monterey Counties (CalOES 2019).

Government Code Sections 65302 and 65302.5, Senate Bill 1241 (Kehoe) of 2012

Senate Bill (SB) 1241 requires cities and counties to address fire risk in SRAs and Very High FHSZs in the safety element of their general plans. The bill also directed amendments to the CEQA Guidelines Appendix G environmental checklist to include questions related to fire hazard impacts for projects located in or near lands classified as SRAs and Very High FHSZs.

Government Code Section 65302, Senate Bill 99

SB 99 amended Gov. Code § 65302 as it relates to land use by mandates a thorough examination and revision of the safety element, incorporating details essential for pinpointing residential developments in hazard zones lacking a minimum of two emergency evacuation routes. Essentially, this legislation aids in identifying neighborhoods and households within hazard areas facing restricted accessibility. While the legislative focus is on designated hazard zones, the evacuation assessment encompasses all residential developments in the City. This includes those beyond designated hazard areas, shedding light on instances where only one emergency evacuation route is available, serving as a comprehensive effort to enhance the City's emergency preparedness.

Government Code Section 65302 and 65302.g.4, Senate Bill 1035 and 379

SB 1035 (Gov. Code § 65302) and SB 379 (Gov. Code § 65302.g.4) mandate that all cities incorporate climate change adaptation and resilience strategies into their general plan safety element. Senate Bill 379 is activated either by the next update of a jurisdiction's local hazard mitigation plan (occurring every five years) or before January 1, 2022, whichever comes first. Building upon Senate Bill 379, Senate Bill 1035 further stipulates that the safety element must be updated every eight years concurrently with the next housing element update.

Government Code Sections 65302.15, Assembly Bill 747 and 1409

Assembly Bill (AB) 747 and AB 1409 (Gov. Code § 65302.15) mandates jurisdictions to delineate evacuation routes, assessing their capacity, safety, and effectiveness across diverse emergency scenarios. Additionally, requires the identification of evacuation sites within the jurisdiction's safety element. To fulfill this obligation, jurisdictions have the option to leverage their Local Hazard Mitigation Plan (LHMP) or emergency operations plan. Compliance is achieved by seamlessly integrating comprehensive details about evacuation routes' capacity, safety, and viability into these documents, with the caveat that the jurisdiction's Safety Element explicitly references the incorporated information.

Government Code Section 65302.6, 8685 Assembly Bill 2140

AB 2140 (Gov. Code § 65302.6, 8685.9) empowers local authorities to incorporate the Local Hazard Mitigation Plan (LHMP) seamlessly into their overall planning framework, specifically within the safety element of the general plan. Encourages integration either through reference or annexation, incentivizing such incorporation post-disaster by offering financial benefits. This includes provisions for covering the local contribution (25% non-federal portion) of grant-funded projects related to post-disaster initiatives, subject to legislative approval.

California Public Utilities Commission General Order 166

General Order 166 Standard 1.E requires that investor-owned utilities develop a Fire Prevention Plan which describes measures that the electric utility will implement to mitigate the threat of power-line fires generally. Additionally, this standard requires that investor-owned utilities outline a plan to mitigate power

line fires when wind conditions exceed the structural design standards of the line during a Red Flag Warning in a high fire threat area. Fire Prevention Plans created by investor-owned utilities are required to identify specific parts of the utility's service territory where the conditions described above may occur simultaneously. Standard 11 requires that utilities report annually to the California Public Utilities Commission (CPUC) regarding compliance with General Order 166 (CPUC 2017). In compliance with Standard 1.E of this General Order, Pacific Gas and Electric Company adopted a Fire Prevention Plan dated October 31, 2018.

REGIONAL AND LOCAL

Willits General Plan

The Willits General Plan Revision – Vision 2020 was adopted in 1992 and the Housing Element was last updated in 2019. Senate Bills 1241 and 1035 mandate that local jurisdictions like the City will update the Safety Element to address wildfire and climate adaptation and resiliency. Both of these requirements have been included in Government Code Section 65302 (g) 1 through 4, requiring Cities to address these issues each time they update their Housing Elements. Of particular note within the current Safety Element are Sections 7.210 of the Safety Policies and Section 7.3150 of the Safety Element Implementation Measures. Section 7.210 in the draft Safety Policies mandates the City's collaboration with the Little Lake Fire District to formulate standards and guidelines ensuring sufficient fire protection, as well as the provision of medical and other emergency services for the entire community, encompassing all individuals and properties. Section 7.3150 in the Safety Element Implementation Measures directs the City to include fire hazards, along with other safety risks, in the evaluation of development proposals.

Draft City of Willits Safety Element

The City of Willits prepared a draft Safety Element Update in October 2019 to address changes in California planning law and to incorporate the Mendocino County Multi-Jurisdiction Hazard Mitigation Plan into the City's General Plan. This Element is not yet in effect and the City anticipates adopting the Safety Element prior to or shortly after the adoption of the Land Use Element Update. The Safety Element directly relates to the Land Use Element and the City will take care to ensure that proposed land uses are planned in a manner that minimizes the impacts of known hazards and that reflect the climate adaptation and resiliency strategies contained in the Local Hazard Mitigation Plan. Draft Safety Element GOAL S-3 contains a range of policies intended to safeguard the community from the threat of urban and wildfire hazards.

Mendocino County Multi-Jurisdictional Hazard Mitigation Plan 2020 Update

Mendocino County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) and the City's Jurisdictional Annex (Local Hazard Mitigation Plan): The MJHMP provides a discussion of hazards within the County and the City of Willits and identifies risks to vulnerable assets, both people and property, and provides a mitigation strategy to achieve the greatest risk reduction based upon available resources. The MJHMP (and the City's Jurisdictional Annex, which serves as the Local Hazard Mitigation Plan) was developed in accordance with the Disaster Mitigation Act of 2000 (DMA 2000) and followed FEMA's Local Hazard Mitigation Plan guidance. Within the City's Annex, hazards are identified and profiled, people and facilities at risk are analyzed, and mitigation actions are developed to reduce or eliminate hazard risk. The implementation of these mitigation actions, which include both short and long-term strategies, involves planning, policy changes, programs, projects, and other activities. The City of Willits adopted its jurisdictional annex chapter of the MJHMP on December 9, 2020. Hazards identified for the City of Willits include earthquakes, wildfire, dam failure, flood drought, extreme weather, pandemic and climate change. Table 4-11, City of Willits Mitigation Actions, lists each hazard and mitigation action for City of Willits.

Municipal Code

The Zoning Regulations establish a Natural Hazard Combining (-H) Zone, Section 17.46.010, that requires that any basic zone with which the (-H) district is combined, a use permit is required for all uses listed as permitted in the basic zone and use permits are conditional to recognize and reduce natural hazards related to a variety of natural hazards including wildfire.

Municipal Code Chapter 15.04 establishes a development impact fee on behalf of the Little Lake Fire Protection District and outlines the procedures for its implementation, addressing development impact mitigation fees imposed by the City of Willits on behalf of the Little Lake Fire Protection District. The adoption of this ordinance creates a fund that facilitates the construction of public facilities and the purchase of fire equipment and apparatus. Associating fees with new development ensures the Little Lake Valley is able to maintain its levels of service and safety as the population and housing stock grows. Without these measures, there would be decreased levels of service, reduced safety, and inadequate fire protection, compromising the ability to safely maintain district public facilities to meet the needs of the new population and new development in the unincorporated areas of the District.

Chapter 15.16 of the Municipal Code is the Willits Fire Code which adopted the Uniform Fire Code Standards which includes all appendices and National Fire Codes and makes the City compliant with national fire safe regulations.

IMPACT ANALYSIS

SIGNIFICANCE THRESHOLDS AND METHODOLOGY

According to Appendix G of the CEQA Guidelines, impacts related to fire risk may be significant if the Project Area is located in or near state responsibility areas (SRA) or lands classified as very high fire hazard severity zones and the project would:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Board of Forestry SRA Viewer was used to assess if the Planning Area, which shows that approximately 55 percent of the Planning Area is SRA, 44 percent LRA (the City boundary, all of the East Valley Street Proposed SOI, approximately 45 percent of the Locust Street Proposed SOI not including the Sherwood Valley Rancheria, and the Little Lake Valley), and the remainder is FRA (Sherwood Valley Tribe Trust land). The assessment of impacts related to wildfire hazards and risks were evaluated using SRA and recommended LRA FHSZ mapping, aerial imagery, and topographic mapping (Cal Fire, 2023). Weather patterns related to prevailing winds, precipitation trends, and land cover estimates from WeatherSpark were evaluated as they relate to the spread and magnitude of wildfire.

The project was also evaluated using Wildfire Evacuation CEQA Thresholds of Significance Checklist created by Fehr & Peers as interim guidance for the California Attorney General's Office. In October 2022, the California Attorney General issued guidance for best practices and mitigation measures for local governments to comply with CEQA while considering whether to approve projects in wildfire-prone areas. This additional step uses the checklist as best available information in response to the Attorney

General's guidance and the analysis was undertaken to provide the City with insight into whether a project would likely result in a significant impact due to wildfire evacuation risk were the interim guidance accepted. The following seven categories and subsequent yes/no questions were used to determine a project's potential CEQA evacuation impacts:

1. Proximity to Hazard
    - Is the project located within a state responsibility area or local responsibility area and within or near an area designated as a high or very high fire hazard severity zone?
    - Is the project located in or near any other defined hazard zone (e.g., flood plain, seismic fault zone, liquefaction zone) that may affect existing evacuation routes to be used during a wildfire evacuation?
2. Project Density
    - Is the project characterized by low- to intermediate-density uses that are dispersed and increase the potential for wildfires to start or spread?
3. Project Location
    - Is the project located at the periphery of an existing community or in the wildland urban interface?
    - Is the project located on ridges, on rugged terrain, or along high wind corridors?
4. Demographics
    - Does the project population and/or surrounding community meet or exceed the city/county/regional average share of senior citizen (65 years of age or more) householders living alone?
    - Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with adults speaking limited English?
    - Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with limited internet access?
    - Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with children under 5 years of age?
    - Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with limited access to vehicles (e.g., 0-1 vehicles per household)?
    - Does the project population and/or surrounding community meet or exceed the city/county/regional average share of population with a disability that may inhibit their ability to evacuate?
5. Evacuation Access
    - Does the project have only one access route for emergency vehicles?
    - Is the project located in an area that is within the average response time of the nearest fire station?
    - Does the road network and street design meet all California Fire Safe Regulations (Public Resources Code Section 4290) (e.g., roadway surface, grade, width, length)?
    - Would the project generate a level of evacuation traffic that would require multiple access roads where only one is proposed?
    - Does the project's jurisdiction have a current safety element compliant with AB 747, AB 1409, SB 99, and SB 1241?
6. Evacuation Egress
    - Would the project conflict with or remove any previously identified community evacuation routes?

- Have prior wildfire evacuations resulted in fatalities and/or significant injuries?
- Would a project substantially change the emergency response or evacuation plan for a community given its location and scale?
- Is there data that indicates wildfire spread would affect and could result in closure of key evacuation routes prior to a full community evacuation?
- Would the project worsen baseline evacuation times for existing community?

7. Consideration of Project Wildfire Risk Reduction Measures
   - Would the project meet all California Fire Safe Regulations (Public Resources Code Section 4290) for new streets and buildings?
   - Does the project have multiple emergency access routes?
   - Would the project provide new firefighting facilities or staffing?
   - Would the project provide wildfire fuel breaks along roads or open space areas?
   - Would the project provide early detection and/or enhanced notification systems?
   - Does the project have sufficient on-site water sources for firefighting?
   - Have first responders indicated in writing that they have significant resources to manage evacuation traffic, such that strategies like contraflow are feasible?
   - Does the project or jurisdiction provide emergency evacuation buses and pickup sites through the school district or through public transportation?

Numerous positive responses in topic areas 1-6 would lead to a significant impact conclusion. Numerous positive responses to questions in category 7, in combination with limited positive responses in topic areas 1-5, could lead to a less-than-significant impact conclusion. The complex nature of a general plan element CEQA analysis necessitated a more nuanced examination of the checklist questions than simple yes or no responses, so each section incorporates a short discussion rather than a strictly positive or negative response

PROJECT IMPACTS AND MITIGATION

Threshold WF-01: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact WF-01: The Land Use Element would foster the development of residential, commercial, industrial, and public land uses and to accommodate increased jobs and population. The timing, location and scale of development allowed of the Land Use Element is not known, but Land Use Element policy is intended to avoid hindering established evacuation routes and ensure orderly road and infrastructure improvements to prevent negative impacts on evacuation access. With the adoption of the Draft Safety Element, the potential for the Land Use Element Update to impair an adopted emergency response plan or emergency evacuation plan would be less than significant with mitigation.

Mendocino County prepared the Mendocino County Evacuation Plan an as an Annex of the Mendocino County Emergency Operations Plan (EOP) in July 2020. The City of Wilits General Plan Safety Element Policy 7.210 directs the City to cooperate with the Little Lake Fire District in developing standards and guidelines to assure adequate fire protection and the provision of medical and other emergency services for all persons and property in the community. Policy 7.230 establishes a five minute or two-mile travel distance as the minimum response time or travel distance from the nearest fire station for land use planning purposes.

The proposed Land Use Element contains a series of policies, in particular LU-2.4, Annexations, intended to provide for orderly development of the City and to provide for a framework for future potential City expansion into the City's Sphere of Influence in a manner consistent with the General Plan, considering preservation of open space lands, and that create a logical City boundary; result in the efficient use of City services and utilities; and support a robust transportation network. The proposed Land Use Element also contains a policy, LU-9.7, Emergency Evacuation, that prohibits subdivisions in neighborhoods having only one access or that are vulnerable to isolation if access roads are impacted. The proposed Land Use Element Update is intended to ensure that the City does not impair the adopted EOP and Evacuation Plan. Relevant policies and implementations are listed below:

The timing, nature, and scale of future development allowed by the Land Use Element is unknown and there is the potential for a future development proposal to conflict with stablished emergency plans. However, future development would undergo project specific review by the City of Willits and the Little Lake FPD and be subject to conditions of approval by the Little Lake FPD. Larger projects, such as subdivisions and use permits would require CEQA review, which would further reduce the potential impact of such a development. For all projects, the City has adopted, and in cooperation with the Little Lake FPD applies the California Fire Code as specified in in Chapter 15.16 of the Willits Municipal Code.

The General Plan would support the Mendocino County/Operational Area Emergency Operations Plan (EOP) and state law directs local agencies to establish close linkages between the Safety Element and the Multi-Jurisdictional Hazard Mitigation Plan. Doing so ensures that the General Plan does not impede or interfere with adopted emergency response or evacuation plans.

The City of Willits is in the process of updating its Safety Element, 2019 Draft Safety Element. The City of Willits has comprehensive emergency response and evacuation policies outlined in the Emergency Operations Plan (EOP) section of the Draft Safety Element. Goal 5 outlines policies covering various hazards such as earthquakes, extreme weather, landslides, transportation accidents, hazardous materials, wildlife fires, energy shortages, dam failures, civic disturbances, terrorist activities, and national security.

Goal 3 seeks to safeguard the community from the threat of urban and wildfire hazards. The following are important policies intended to carry out this goal.

> Policy S-3.5, would require all new development to comply with fire safety standards identified in Chapter 15.16 of the Willits Municipal Code,
>
> Policy S-3.6, would identify recommendations from the Little Lake Fire Protection District to ensure adequate service is provided to residents and businesses,
>
> Policy S-3.7 would seek to locate new critical facilities outside of the Very High Fire Hazard Severity Zones, unless no alternate location is available or feasible,
>
> Policy S-3.8 would require all new development and major redevelopment/reconstruction within the high and very high wildfire hazard severity zones to prepare a Fire Protection Plan,

However, the Draft Safety Element has not been adopted and cannot yet be relied upon to lessen potential impacts and the existing Safety Element may not reflect recent legislative requirements. Adoption of the Draft Safety Element would further reduce potential impacts from development allowed by the Land Use Element Update and ensure that impacts are less than significant. By including Mitigation Measure GEO-1, Adopt Draft Safety Element, the updated wildfire hazard policies of the Draft Safety Element would apply within the City. Through the implementation of existing regulations and this

mitigation measure, the potential for the Land Use Element Update to impair an adopted emergency response plan or emergency evacuation plan would be less than significant.

Mitigation Measure

Mitigation Measure GEO-1 defined in Section 4.7 Geology and Soils Impact GEO-1 would be applied to ensure that wildfire hazard policies of the Draft Safety Element would apply within the City.

Significance After Mitigation

Impacts would be less than significant with mitigation.

Threshold WF-02: Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Impact WF-02: Willits is identified as Wildland-Urban Interface (WUI) in the CAL FIRE FHSZ Viewer, with many parts of the Project Area falling within Moderate and High Fire Hazard Severity Zones. However, there are no proposed Sphere of Influence (SOI) or land use designation changes in areas with very high FHSZs. The adoption of the Draft Safety Element would be required to mitigate the potential for the Land Use Element Update to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire to less than significant.

The CAL FIRE FHSZ Viewer identifies the City of Willits as WUI, and many parts of the City fall within the Moderate and small portions within High FHSZs. No portions of the proposed Sphere of Influence (SOI) or land use designation change areas are within areas of Very High FHSZ. The majority of the proposed SOI Area is within the SRA and classified as within Moderate (which is the lowest risk of all mapped categories) or High FHSZs. The high FHSZ areas are primarily located in foothill and forested areas of the City. There are several policies and implementation measures proposed by the Land Use Element and existing regulations to ensure that new development does not exacerbate fire risk in the community.

Future development allowed by the Land Use Element would result in residential, commercial, industrial, and public uses, which are expected to increase employment and population in the City. The scale and scope of development allowed under the proposed Land Use Element Update is not known at this time, but development would be required to be consistent with policies under the General Plan, as amended. Proposed Land Use Element Update Goal 1, Planning Area, prioritizes logical and appropriate annexations that maintain a compact City boundary as well as surrounding open space, working lands and natural resources and Goal LU-2, Planning for Growth, promotes growth within infill and redevelopment sites near neighborhood commercial areas. These goals and associated policy seek orderly and planned development which prioritizes infill and logical city expansion, while maintaining open space areas. Changes in vegetation composition can negatively affect fire management and change the fire regime in the area. Policies and implementation measures under Goal 8 ensure that land use decisions protect and sustain important natural resources and limit exposure to hazards, which would maintain natural resources and limit development within such areas, thereby limiting the uncontrollable spread wildfire. In addition, Policy LU-9.7, Emergency Evacuation, would prohibit subdivisions of property without multiple access roads.

Development consistent with the Land Use Element could result in possible fire ignition during construction (e.g. related to heavy machinery usage). For this reason, the City's adoption of the Draft Safety Element is needed to mitigate the potential to exacerbate wildfire conditions in new developments. The following draft Safety Element policies would, upon implementation, mitigate potential wildfire dangers to new development.

- S-3.1 Maintain up-to-date records and information on conditions in undeveloped and natural areas, especially areas considered part of the high and very high fire hazard severity zones.
- S-3.2 Promote comprehensive structural modification and fuel modification guidelines for new and existing (non-conforming) buildings and structures located within the high and very high fire hazard severity zones, in compliance with local and State [WUI] code requirements of the California Building Code, and any future updates.
- S-3.3 Restrict new development in high and very high fire hazard severity zones, unless designed using the most up to date wildfire mitigation techniques and code requirements, in compliance with local and State Wildland-Urban Interface code requirements.
- S-3.4 Coordinate wildfire response plans (i.e. CAL FIRE Unit Fire Plan) with Local, State, Federal, and Tribal entities, as appropriate.
- S-3.5 Require all new development to comply with fire safety standards identified in Chapter 15.16 of the Willits Municipal Code
- S-3.6 Identify key metrics and recommendations from the Little Lake Fire Protection District to ensure adequate service is provided to residents and businesses.
- S-3.7 Locate new critical facilities outside of the very high fire hazard severity zone unless no alternate location is available or feasible.
- S-3.8 Require all new development and major redevelopment/reconstruction within the high and very high wildfire hazard severity zones to prepare a Fire Protection Plan.
- S-3.9 Consider the relationship between existing and future development on the current and future demands for Fire and Emergency Services facilities and personnel.
- S-3.10 Coordinate vegetation management activities with Cal FIRE, LLFPD, and users of the railway, including the Skunk Train and ensure fire risk is reduced within the railroad right of way.
- S-3.11 Identify and establish fire breaks in key locations (prioritizing the City's airport and water treatment plant) that preserve and protect critical infrastructure and reduce wildfire vulnerability for the City

However, the Draft Safety Element is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the wildfire hazard policies of the Draft Safety Element would apply within the City. Through the implementation of this mitigation measure, potential for the Project to exacerbate wildfire risks would be less than significant. A less than significant impact would occur with mitigation incorporated.

MITIGATION MEASURE

Mitigation Measure GEO-1 defined in Section 4.7 Geology and Soils Impact GEO-1 would be applied to ensure that wildfire hazard policies of the Draft Safety Element would apply within the City.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant with mitigation.

Threshold WF-03: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact WF-03: Development consistent with the Land Use Element may require the installation or maintenance of associated infrastructure. The adoption of the Draft Safety Element would be required to mitigate to ***less than significant levels,*** *the potential for the Land Use Element Update to require the installation or maintenance of associated infrastructure that may exacerbate fire risk.*

Development allowed by the Project would require improvements to the City's roads, water, wastewater, and stormwater drainage facilities. Given that this is a long-range land use plan, the location, timing, and nature of construction of new or expanded roads, water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities are not known at this time. However, infrastructure improvements necessary to serve the more distant portions of the Proposed SOI Area or the southernmost area of the City would likely be more extensive.

Utilities and infrastructure to serve development consistent with the Land Use Element could require the construction or maintenance of infrastructure that may exacerbate fire risk. For this reason, the City's adoption of the Draft Safety Element is needed to reduce wildfire conditions in new developments. The following Safety Element policies reduce potential wildfire dangers to new development.

- S-3.1 Maintain up-to-date records and information on conditions in undeveloped and natural areas, especially areas considered part of the high and very high fire hazard severity zones.
- S-3.2 Promote comprehensive structural modification and fuel modification guidelines for new and existing (non-conforming) buildings and structures located within the high and very high fire hazard severity zones, in compliance with local and State [WUI] code requirements of the California Building Code, and any future updates.
- S-3.3 Restrict new development in high and very high fire hazard severity zones, unless designed using the most up to date wildfire mitigation techniques and code requirements, in compliance with local and State Wildland-Urban Interface code requirements.
- S-3.4 Coordinate wildfire response plans (i.e. CAL FIRE Unit Fire Plan) with Local, State, Federal, and Tribal entities, as appropriate.
- S-3.5 Require all new development to comply with fire safety standards identified in Chapter 15.16 of the Willits Municipal Code

- S-3.6 Identify key metrics and recommendations from the Little Lake Fire Protection District to ensure adequate service is provided to residents and businesses.
- S-3.7 Locate new critical facilities outside of the very high fire hazard severity zone unless no alternate location is available or feasible.
- S-3.8 Require all new development and major redevelopment/reconstruction within the high and very high wildfire hazard severity zones to prepare a Fire Protection Plan.
- S-3.9 Consider the relationship between existing and future development on the current and future demands for Fire and Emergency Services facilities and personnel.
- S-3.10 Coordinate vegetation management activities with Cal FIRE, LLFPD, and users of the railway, including the Skunk Train and ensure fire risk is reduced within the railroad right of way.
- S-3.11 Identify and establish fire breaks in key locations (prioritizing the City's airport and water treatment plant) that preserve and protect critical infrastructure and reduce wildfire vulnerability for the City.

The Land Use Element Update does not propose specific infrastructure, utilities, or transportation network improvements that may be required to adequately serve subsequent individual developments consistent with the Project. The Draft Safety Element is not yet adopted and the policies in that Element defined to lessen wildfire hazards and risks cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01, the updated wildfire hazard policies of the Draft Safety Element would apply within the City. In addition, any new City utility and infrastructure project to serve development consistent with the Land Use Element Update would be subject to additional CEQA review to analyze project and location specific impacts. Through the implementation of Mitigation Measure GEO-01 and subsequent CEQA review, the potential for the Land Use Element Update to result in the installation or maintenance of associated infrastructure that may exacerbate fire risk would be less than significant.

Mitigation Measure

Mitigation Measure GEO-1 defined in Section 4.7 Geology and Soils Impact GEO-1 would be applied to ensure that wildfire hazard policies of the Draft Safety Element would apply within the City.

Significance After Mitigation

Impacts would be less than significant with mitigation.

Threshold WF-04: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact WF-04: New development consistent with the Land Use Element facilitates may be located in areas that would be impacted by downslope/downstream flooding or landslides, post-fire slope instability, or drainage changes. With the adoption of the Safety Element which contains policy to ensure future development in areas impacted by flooding and landslides which would also be impacted by a

postfire instability, is appropriately sited and designed, the potential impacts of Land Use Element implementation will be less than significant.

Willits faces a significant threat of damage due to wildfires and new development allowed by the Land Use Element has the potential to occur in areas with the potential for post-fire impacts risks, including downslope or downstream flooding or landslides, as a result of runoff. Portions of the Project Area, particularly in the northeastern section, are designated as 100-year and 500-year flood zones and portions of the Project Area contain steep slopes that may be at risk of post fire landslides. These areas are at an increased risk of flooding following a wildfire due to increased stream flows and sedimentation from wildfire debris.

Landslides, the downward movement of earth materials on slopes, can result from post wildfire impacts such as heat damaged soil and loss of vegetation to hold soil in place, exacerbated by events such as heavy rain. When rain triggers slope failure, it's termed a mudslide, both of which pose significant danger to structures and can cause harm to individuals unable to move away in time. While the Project Area in Willits generally has a low risk of landslides, specific regions, mainly along the southern and western parts, warrant attention to protect residents, businesses, and community assets. For a more detailed discussion of landslide risks in the Project Area see Section 4.7 Geology and Soils.

The proposed Land Use Element contains a series of policies and implementation programs that would lessen the potential for downslope or downstream flooding or landslides to the City's inhabitants. Goal LU-8, Protect Natural Resources within Areas Planned for Development, is intended to ensure that land use decisions protect and sustain important natural resources and limit exposure to hazards. In particular, Policy LU-8.1, Riparian Buffer Areas, and Implementation, LU-8A, Stream and Riparian Combining Zone, prohibit development with riparian areas, protecting these areas from further development. Policy LU-10.6 adds a Natural Hazard Area General Plan Land Use Map Overlay Designation to show lands subject to hazards such as excessive slopes or soil instability that could be exacerbated by post-fire impacts.

The Draft Safety Element contains a series of policies that are intended to lessen impacts relating to floods and landslides. Goal S-1 that improve the community's resilience to landslides such as:

- Policy S-1.2 which identifies if new or existing structures are in areas of risk from landslides and implements corrective action.
- Policy S-1.5 which requires new development to observe 30-foot setbacks from all hillsides and other sloped surfaces that show medium to high landslide susceptibility (Class VII or greater).
- Policy S-1.6 which would restrict development in areas prone to liquefaction and/or landslide unless an independent geotechnical investigation determines the site is safe for development.

The previously mentioned Natural Hazard Area designation would work in tandem with the Draft Safety Element which also contains policies that would protect new development from the potential postfire impacts of flooding such as:

- Policy S-2.3 which identifies if existing and new structures are located within 100- and 500-year floodplains and take corrective action to minimize the risk of injury or damage from flooding events
- Policy S-2.4 which identifies and pursues funding opportunities to improve infrastructure located within the 100-year and 500-year floodplains

- Policy S-2.5 which restricts new development in high-flood risk areas, such as the 100- and 500-year floodplains and floodways, unless addressed through adequate flood proofing and mitigation
- Policy S-2.6 which designs and maintains storm drainage infrastructure to accommodate, at minimum, 100-year flood events
- Policy S-2.10 which would periodically update the Floodplain Management Regulations adopted in the Willits Municipal Code
- Policy S-2.12 which develops flood management strategies that prioritize healthy ecological practices that integrate effectively with wildfire management priorities

Development in flood zones must also comply with City of Willits Municipal Code Sections 17.38 and 17.40, ensuring structures are designed to withstand floods and mitigating the risk of pollutants released due to inundation. For a more detailed discussion of flooding risks in the Project Area see Section 4.10 Hydrology and Water Quality.

As the City considers future development and infrastructure projects, each undertaking will undergo scrutiny for compliance with the California Building Standards Code, the Willits General Plan, and other pertinent regulations. Willits General Plan Safety Element Implementation Measure 7.310 requires the Little Lake Fire District review all proposed construction projects prior to permit issuance and the incorporation of applicable conditions of approval and Safety Element Implementation Measure 7.350 directs the City to consider fire, flooding, geologic and seismic safety risks in reviewing proposals for development.

However, the Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential impacts. By including Mitigation Measure GEO-01 the updated wildfire hazard and flood policies of the Draft Safety Element would apply within the City. Through the implementation of this mitigation measure, the potential for the Project to result in downslope or downstream flooding or landslides would be less than significant. A less than significant impact would occur with mitigation incorporated.

MITIGATION MEASURE

Mitigation Measure GEO-1 defined in Section 4.7 Geology and Soils Impact GEO-1 would be applied to ensure that wildfire hazard policies of the Draft Safety Element would apply within the City.

SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant with mitigation.

Wildfire Evacuation Interim Guidance

Impact WF-05a: The Land Use Element is a programmatic Project which, for the most part, has a neutral impact on existing conditions in the City for Categories 1-6 aside from the policy regarding Emergency Evacuation which positively affects future conditions. Many of the issues of concern identified by the categories are existing conditions and Project impacts would be less than significant impacts by updating and adopting the City's 2019 Draft Safety Element.

Impact WF-05b: The Land Use Element has a neutral impact on existing Wildfire Risk Reduction Measures. Updating and adopting the City's 2019 Draft Safety Element would lessen impacts relating to Categories 1-6, and potential wildfire evacuation impacts from the Land Use Implementation would be less than significant.

IMPACT WF-05A

The Attorney General's Evacuation Interim Guidance is crafted to analyze aspects of a development projects with known locations, access provisions, and design elements. Whereas the proposed Land Use Element Update and Sphere of Influence Amendment is not a development project. The proposed Project involves the adoption of a new land use policy and land use changes in various locations in the City that are subject to varying wildfire hazards. In addition, the current access to parcels that are within the Proposed Sphere of Influence expansion areas may not reflect the access for a proposed future project or what would be required by the City as conditions of approval.

For a single discrete Project, numerous positive responses to questions in categories 1-6 would indicate that the project could have a significant impact on wildfire evacuation risks. However, as this is a programmatic Land Use Element Update, a simple yes or no response is not always applicable. Instead, a discussion of categories 1-6 is provided in relation to reflect the anticipated future conditions under proposed Land Use Element resulting for the implementation of policies and programs that area intended to reduce City's risk of wildfire for each category is included below category 6.

Category 1. Proximity to Hazard

Is the project located within a state responsibility area or local responsibility area and within or near an area designated as a high or very high fire hazard severity zone?

- The Project Area is currently a mix of LRA and SRA. Roughly 60% of the Project Area within City boundaries is within a recommended High or Moderate FHSZ as mapped by CAL FIRE. Within the Project Area, a majority of the land is classified as Moderate FHSZ although there are concentrations of High and Very High FHSZ at the northern, western, and southern boundaries. For the proposed SOI, a small portion of the Mill Creek Drainage, most of the State Route 20 and Cropley Lane Area contain High FHSZ and the Mill Creek Drainage is Moderate FHSZ. The portions of the Locust Street area that are SRA and the Muir Mill Area is are Moderate FHSZ. The Land Use Element would have a negative impact on current conditions regarding proximity to hazards if it allowed new development in the areas identified as high FHSZ without appropriate hazard reduction.

Is the project located in or near any other defined hazard zone (e.g., flood plain, seismic fault zone, liquefaction zone) that may affect existing evacuation routes to be used during a wildfire evacuation?

- The Project Area is within multiple hazard zones though only the geologic hazard zones in the hillsides surrounding the City would affect existing evacuation routes during a wildfire evacuation unless more than one natural hazard were to occur at once. There is an active fault line that transects the community and could potentially impact evacuation routes and infrastructure if a seismic event were to occur. Implementation of the Land Use Element would not alter the existing conditions for the City regarding its location in relation to other defined hazard zones. The existing and proposed Safety Element directs the consideration of fire and seismic hazards as a part of project review.

Category 2. Project Density

Is the project characterized by low- to intermediate-density uses that are dispersed and increase the potential for wildfires to start or spread?

- Residential development in Willits is low- to moderate- density, with density ranges of 0-30 units per acre. Although more dense residential neighborhoods surround the downtown core, there are more low-density residential communities in the western and southern sections of the City. The City proposes to increase the density of undeveloped properties in both the western and southern sections through land use designation changes. The Land Use Element proposes to prioritize residential and commercial infill which would is intended to increase the density of land use and decrease the likelihood of development. However, the Land Use Element applies land use designations that would increase the allowable density in areas with dispersed development, which would occur in tandem with the extension of with required utilities, services and access routes and would be subject recommendations by the Little Lake Fire Protection District relating to ignition and wildfire hazard reduction.

Category 3. Project Location

Is the project located on periphery of an existing community or in the wildland urban interface?

- The City of Willits is an existing community with urban areas and is also almost entire WUI interface (the developed areas) or intermix (the less developed areas). Implementation of the Land Use Element would involve land designation changes within the City urbanized areas and the proposed additions to the SOI at the periphery of an existing community. Future annexations and subsequent development would occur in tandem with the extension of required utilities, services and access routes and would be subject recommendations by the Little Lake Fire Protection District relating to ignition and wildfire hazard reduction in consideration of WUI related impacts.

Is the project located on ridges, on rugged terrain, or along high wind corridors?

- Although the City watershed is surrounded by ridges and rugged terrain, the Land Use Element does not contain land use changes or proposed SOI additions in these regions.Implementation of the Land Use Element does not impact future wind corridor conditions.

Category 4. Demographics

As the Land Use Element facilitates future growth, the potential demographics of future developments and population growth is uncertain. This discussion therefore uses Census Bureau Data to understand the current demographics as it relates to the existing City of Willits population and how it compares to current Mendocino County population demographics.

Table 3.19f: Demographic Category Comparison of Willits, Mendocino County, and California by Percent Total of Occupied Housing Units

Category	Willits (City) Estimate % of Total Occupied Housing Units	Mendocino (County) Estimate % of Total Occupied Housing Units
65+ Living Alone	4.8%	2.8%

Category	Willits (City) Estimate % of Total Occupied Housing Units	Mendocino (County) Estimate % of Total Occupied Housing Units
Limited English Speakers	-	-
No Internet Access	22.3%	13.0%
Children under 6 years of age	3.5%	4.2%
Access to 0-1 vehicles	62.8%	39.6%
Disability that may inhibit their ability to evacuate	25.6%	19.0%

Note: Data highlighted in gold indicate categories where the City of Willits does not meet or exceed the percentage of total occupied housing units for the County.

Source: (U.S. Census Bureau, 2017-2021)

Does the project population and/or surrounding community meet or exceed the city/county/regional average share of senior citizens (65 years of age or more) householders living alone?

- The City of Willits population currently exceeds the County average share of senior citizen householders living alone. However, the City's pattern of residential neighborhoods with homes in relatively close proximity, where neighbors can help neighbors, and the proximity of homes to emergency and other services is a benefit to seniors living.

Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with adults speaking limited English?

- The City of Willits' population does not meet or exceed the County average.

Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with limited internet access?

- The Census Tract containing the City of Willits exceeds the County average of households *with limited internet access*. Willits is an urbanized area and internet service cellular and broadband internet would be available within land use change areas within the City and to SOI expansion areas.

Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with children under 5 years of age?

- The City of Willits' population does not meet or exceed the County average.

Does the project population and/or surrounding community meet or exceed the city/county/regional average share of households with limited access to vehicles (e.g., 0-1 vehicles per household)?

- The Census Tract containing the City of Willits exceeds the County average for *households with limited access to vehicles*. Willits is an urbanized area that is considered walkable, where homes are typically located near to services and there is a network of roads with multiple routes. In addition, Willits has transit service and evacuation planning integrates transit and school bus capabilities.

Does the project population and/or surrounding community meet or exceed the city/county/regional average share of population with a disability that may inhibit their ability to evacuate?

- The City of Willits population exceeds the County average.

Category 5. Evacuation Access

Does the project have only one access route for emergency vehicles?

- The City of Willits contains a network of roads with multiple routes, but there are limited roads serving existing development within the Proposed SOI Areas. Some large parcels are undeveloped and only accessed by a single driveway, and many parcels are currently developed and do not appear to have multiple access or egress routes. Should a proposed SOI be annexed, new development would be required to be consistent with General Plan policy and be subject to the California Fire Code. For the proposed development to be approved, two evacuation routes would need to be provided to be consistent with Land Use Element policy LU-8.6, and fire code requirements regarding access and egress.

Is the project located in an area that is within the average response time of the nearest fire station?

- Policy 7.230 of the Willits General Plan Safety Element establishes a five-minute maximum response time for a new development permit. According to Google Maps estimates, under regular daytime traffic conditions, it is anticipated to take approximately 4-5 minutes to travel from Station 54 to the westernmost point of West State Route 20 sphere of influence (Google, 2023). Similarly, the drive time to the southernmost tip of the Southern Estates Residential Land Use Change area and proposed SOI is approximately 7-8 minutes from the Baechtel Substation which is the nearest fire protection facility. Policy 7.230 allows for a two-mile travel distance from the nearest fire station if the five-minute response time is not met, in order to grant a new development a permit (with approval conditional to water supply adequacy, emergency vehicle access, road widths, turning radii and building design features to be reviewed by the LLPFD). The Southern Estates Residential Land Use Change area is nearly 2 miles away from Baechtel Substation. These calculations, based on coordinates at the farthest proposed residential land use designations from the current City limits, fall within the criteria of policy 7.230, indicating that there will be no significant impact on response times or the performance of fire protection services in these areas. Notably, these estimates do not consider the potential use of emergency response tools such as lights, sirens, and signal pre-emption, along with the option for emergency vehicles to navigate opposing travel lanes in congested situations. These tools could enhance the ability of emergency response personnel to achieve more timely responses during emergency situations and reduce travel times.

Does the road network and street design meet all California Fire Safe Regulations (Public Resources Code Section 4290) (e.g., roadway surface, grade, width, length)?

- The Little Lake FPD follows the California Safe Regulations within SRA and the California Fire Code, which also contains specific requirements for road with and geometry, however, incorporated areas that are not Very High FHSZ are not subject to the Fire Safe regulations. Should a proposed SOI be annexed, new development would be required to comply with fire safety standards identified in Chapter 15.16 of the Willits Municipal Code and the California Fire Code. The Land Use Element prioritizes residential and commercial infill so potential the population growth and new developments is intended occur in areas already urbanized within City limits. If population growth were to happen in the County as a whole, wildfire hazards would likely

be lessened (due to proximity to fire and emergency services, fire flow capacity, existing road network) if new developments were to occur in areas already urbanized such as within City limits or within a proposed SOI area once it is annexed by the City.

Would the project generate a level of evacuation traffic that would require multiple access roads where only one is proposed?

- Development consistent with the Land Use Element Update would be subject to the California Fire Code and required to comply with the conditions of approval of the Little Lake FPD, the City of Willits Draft Safety Element, and Policy LU-9.7 regarding emergency evacuation. In addition, subdivisions would undergo project specific CEQA review, which would address impacts relating to evacuation and roadway safety. Some areas will not require additional access roads as the transportation infrastructure may be sufficient for potential development.

Does the project's jurisdiction have a current safety element compliant with AB 747, AB 1409, SB 99, and SB 1241?

- The 2019 City of Willits Draft Safety Element has not yet been adopted and was prepared prior to the signing of AB 747, AB 1409, and SB 99. Mitigation Measure GEO-1 in Section 4.7 4.7 Geology and Soils Impact GEO-1 would be applied upon approval of the Land Use Element Update to require that the City of Willits shall complete the process of updating and adopting the Draft Safety Element consistent with state law and initiate the process of putting into effect the implementation program.

Category 6. Evacuation Egress

Would the project conflict with or remove any previously identified community evacuation routes?

- Any development facilitated by the implementation of the Land Use Element would not remove evacuation routes and the Land Use Element does not propose the removal or obstruction of existing evacuation routes. The Land Use Element contains policies that prohibit the intensification of residential development in areas with only one access, improve transportation infrastructure and minimize vehicle trips by promoting walking, bicycling, and transit.

Have prior wildfire evacuations resulted in fatalities and/or significant injuries?

- The Redwood Complex Fire was located near Willits in the communities of Redwood Valley and Potter Valley. High winds caused the fire to move quickly and resulted in multiple fires converging, hindering firefighting efforts and evacuation of residents in Potter Valley. There were approximately 8,000 people evacuated from the area, 20 people hospitalized with severe burns, and nine fatalities.

Would a project substantially change the emergency response or evacuation plan for a community given its location and scale?

- Future residential development allowed by the Project would result in an increase in residents which would increase the need for services from the Little Lake FPD and Willits PD; however such growth is not expected to impact emergency response times. See Section 4.15 Public Services for more detailed discussion of impacts on emergency response. With the adoption of Draft Safety Element, Policy S-5.4 would implement an emergency early warning system in Willits itself,

emergency response during a wildfire evacuation could be improved further with earlier community notification. The evacuation plan is not expected to change due to project implementation. The Mendocino Fire Vulnerability Assessment notes that the two primary evacuation routes for the area, Highway 101 and Highway 20, are well maintained and more than adequate carrying capacity for evacuation purposes. Proposed SOI are located along these major evacuation routes.

Is there data that indicates wildfire spread would affect and could result in closure of key evacuation routes prior to a full community evacuation?

- During the nearby Redwood Complex Fire, the fire managed to rapidly spread on both sides of Highway 101 resulting in the closure of this vital transportation artery between Willits and Ukiah (Fire Vulnerability Assessment For Mendocino County, 2020). This fire has shown that the right combination of wind, topography, and very dry fuel conditions a fire could exhibit extreme erratic behavior that is difficult for fire managers to accurately predict the exact direction of fire travel in the region.

Would the project worsen baseline evacuation times for existing community?

- The Mendocino Evacuation Plan has identified no existing chokepoints and stated that existing transportation infrastructure is more than adequate carrying capacity for wildfire evacuation. In addition, the 2016 completion of the HWY 101 Willits Bypass has greatly reduced congestion in the Main Street Area which is the location for a majority of residences within the City and the focus of infill by the Land Use Element.

Discussion:

A majority of the responses to questions in Category 1-6 were positive, indicating a possibly significant impact with current conditions. However, many of the questions that identify concerns, such as those relating to demographics and past fire history, are existing conditions and the Land Use Element would not exacerbate the current conditions. The proposed Land Use Element contains a series of policies and implementation programs intended to reduce the City's risk of wildfire due to categories 1-6. Relevant policies and implementations are listed below.

- Goal LU-1 is intended to ensure logical and appropriate annexations that maintain a compact City boundary as well as surrounding open space, working lands and natural resources and support disadvantaged communities (LU-1.5, Disadvantaged Unincorporated Communities).
- Goal LU-2 is to promote growth within infill and redevelopment sites near neighborhood commercial areas (Policy LU-2.2, Infill Development)
- Goal LU-3 is intended to achieve a community design that promotes neighborhood vitality, health, energy efficiency, and conservation (policies LU-3.3, Mixed Use Areas and LU-3.6, Consider Public Health in Land Use).
- Goal LU-7 is intended to ensure the needs of all communities in City are considered in decision making (Policies LU-7.4 Environmental Justice and LU-7.5 Neighborhood Involvement in Decision-Making.
- Goal LU-8 is intended to ensure that land use decisions protect and sustain important natural resources and limit exposure to hazards by assuring that appropriate access and egress is

provided as part of the approval of project that intensity residential development (LU-8.6, Emergency Evacuation).

As this is a programmatic project and not a specific development project, some of the questions in this analysis are not applicable at this time. The Land Use Element's policies and implementation measures would not change the City's current conditions regarding proximity to hazard, location, and density (categories 1-3). The Land Use Element is intended to guide future development in an orderly manner and seek to reduce risks and hazards in development areas. Policies such as LU-2.2, Infill Development, and LU-3.3, Mixed Use Areas, prioritize infill development and encourage mixed use development, both of which would minimize the expansion of the City's development footprint and impacts from current conditions regarding the proximity to hazard, location, and density. These are further supported by LU-LU-3.6, Promote a Healthy Community, that directs the City to consider public health, welfare, and safety in land use and thus prioritize development in lower fire hazard areas.

In addition to the proposed policies and measures within the Land Use Element, the Draft Willits Safety Element seeks to safeguard the community from the threat of wildfire hazards and several policies mitigate the current risks identified for categories 1-6. Policies S-3.2 and S-3.3, for instance, would promote comprehensive structural modification and fuel modification for new and nonconforming existing structures within the high and very high fire hazard severity zones as well as restrict new development facilitated by the Land Use Element in those FHSZ, unless the development was designed using the most up to date wildfire mitigation techniques and code requirements which would make development in compliance with local and State Wildland-Urban Interface code requirements. These would address issues of concern in categories 1 and 2 concerning project proximity to hazard and location. Furthermore, policy S-3.8 would require all new development and major redevelopment/reconstruction within the high and Very High FHSZ to prepare a Fire Protection Plan which would address issues of demographics and evacuation ingress or access.

Regarding category 4, there were existing conditions of concern relating to internet access, vehicle access, and disability demographic planning. The Land Use Elements includes Policies LU-1.5, Disadvantaged Unincorporated Communities, and LU-7.4, Environmental Justice, that directs the City to consider disadvantaged communities and environmental justice issues as they are related to potential health impacts associated with land use decisions on residents regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location. Policy LU-7.5, Neighborhood Involvement in Decision-Making, seeks to involve the neighborhoods impacted by new developments in the decision-making process to avoid, reduce, or mitigate disproportionate adverse health and safety impacts of land use decisions on disadvantaged communities. These policies work together to prioritize the safe location and evacuation processes for these vulnerable demographic groups in land use planning.

The emergency alert systems for the regions, namely MendoAlert and Nixle, relies on cellphone service, landline service, and email (internet service). However, the Fire Vulnerability Assessment and Multi-Jurisdictional Multi-Hazard Mitigation Plan both identify that cell service can be spotty in the Willits area though usually adequate along the Highway 101 corridor. According to the Federal Communications Commission Mobile (FCC) LTE Coverage data, which was last updated in 2021, residents who rely on US Cellular and Verizon for their cell service have several areas within City limits and proposed SOI not covered by LTE voice and/or data although residents with AT&T and T-Mobile cell service as their providers were fully covered within City limits (FCC, 2021). For US Cellular, portions of the City surrounding State Route (SR) 20, Baechtel Road, and Exley Lane were not covered by data or voice service as well as areas within proposed West SR 20 SOI, Southern Estates SOI, Sherwood Valley SOI, Cropley Lane SOI, Locust Street SOI, and Muir Mill Road SOI. Verizon did not provide full data or voice

coverage in portions of the Cropley Lane SOI, Sherwood Valley SOI, and Locust Street SOI. A small section of the City near the intersection of Muir Hill Road and South SR 20 was also not covered by Verizon voice service.

Landline or hardwire phone service is generally not used in rural areas, so in case of impacted cell service, access to internet can be critically important for accessing wildfire evacuation information and notifications. It was also noted by the Fire Vulnerability Assessment that during the Redwood Complex Fire the cell phone and hardwire phone systems were either fire damaged or overloaded in the area. The Multi-Hazard Mitigation Plan further notes that the City of Willits currently lacks a redundant communications system and many cell service towers do not have backup power generation. However, the City exceeds the County average for limited internet access. See Table 3.19g below for a detailed breakdown of these averages.

Table 3.19g: Demographics Categories That Willits Exceeds County Averages

Demographics of Concern	Willits (City) Estimate % of Total Occupied Housing Units	Mendocino (County) Estimate % of Total Occupied Housing Units
No Internet Access	22.3%	13.0%
Access to 0-1 vehicles	62.8%	39.6%
Disability that may inhibit their ability to evacuate	25.6%	19.0%

Source: (U.S. Census Bureau, 2017-2021)

The Willits Draft Safety Element seeks to address this issue with policy S-5.4 which would establish and maintain an early warning communication system to allow for enhanced notification of emergency situations within the community. Additionally, policies S-5.1 and S-5.6 would identify and maintain critical facilities such as cell service or analyze potential backup power generation for the community which could help maintain cell service or internet service during natural hazards. The Mendocino County Evacuation Plan has identified back up communication equipment in the event the City needs to evacuate their Emergency Control Center (ECC). CALFIRE has Altaris CAD and the Vesta 911 phone system available on a laptop computer along with cell phones that can be used remotely and a mobile radio for a short duration operation. CAL FIRE has access to a Mobile Communications Center for a backup Emergency Command Center, if needed for a long duration event, which is generally available within four hours (CAL FIRE, 2023).

Limited internet access was not the only demographic criteria for which the City exceeded the County average. The City has significantly more housing units with limited access to vehicles as well as disabilities that may inhibit their ability to evacuate. See Table 3.19g above for a detailed breakdown of these averages. It is critically important that the community is able to provide transportation assets available to these vulnerable in case of a wildfire evacuation. The MTA emergency evacuation transportation assets located within the Willits location has three wheelchair capable vehicles of which include a 42-passenger bus, an 18-passenger bus, and an 8-passenger van. A comprehensive evacuation plan is imperative to outline the proper utilization of these assets in providing services to members of the community within these demographic categories. The City sought to do this with Program 1 and Program 2 of the Draft Safety Element. Program 1 includes the development of a standardized plan of action for evacuating residents. Program 2 would not only identify vulnerable populations within Willits that may require transportation services or have limited mobility but also identify available

community services to support vulnerable populations and further distribute vulnerable population information with City Departments that may support community needs during a hazard event. These are further supported by the 2022 Mendocino Regional Transportation Plan (RTP) & Active Transportation Plan which encourages local agencies to implement, as appropriate, recommendations in the 2020 Fire Vulnerability Assessment and Emergency Evacuation Plan under Policy TSER 1.3 (MCAOG, 2022). It further seeks to advocate for, and seek funding to build new emergency evacuation routes, and improve/harden secondary evacuation routes under Policy TSER 2.4 so as to encourage safety measures for all modes of the regional transportation system. The Mendocino County Evacuation Plan provides additional information on the management of access and functional needs populations (AFN) such as those identified by the demographic's information. To assist in proper emergency response, the Mendocino County Health and Human Services Agency maintains a "comprehensive vulnerable population list that details an individual's specific access and functional need along with their contact information" (Mendocino County, 2020). Using this information, the Incident Action Plans (IAP) created for hazards as they occur will target AFN populations and residential care/nursing facilities with door-to-door notifications wherever practical. This is particularly important for the City of Willits where the Mendocino County Evacuation Plan has identified seven separate vulnerable population locations such as assisted living facilities and senior residences.

The responses to the questions regarding evacuation access in category 5 are a mix of positive and negative responses. Several of the above policies overlap with issues identified by the emergency access questions. For the positive response about emergency access, the proposed Land Use Element directly addresses this issue with Policy LU-9.7, Emergency Evacuation, concerning emergency evacuation by mandating new development must have two access routes.

For questions that relate to state Fire Safe Regulations, such regulations are only applicable within SRA and thus would not be applicable to development allowed by the Land Use Element Update. However, new development under the Land Use Element would be subject to the California Fire Code and the conditions of approval required by the Little Lake FPD. Policies relating to wildland fire hazard reduction contained in the Draft Safety Element are described below:

- S-3.2 Promote comprehensive structural modification and fuel modification guidelines for new and existing (non-conforming) buildings and structures located within the high and very high fire hazard severity zones, in compliance with local and State [WUI] code requirements of the California Building Code, and any future updates.
- S-3.3 Restrict new development in high and very high fire hazard severity zones, unless designed using the most up to date wildfire mitigation techniques and code requirements, in compliance with local and State Wildland-Urban Interface code requirements.
- S-3.4 Coordinate wildfire response plans (i.e. CAL FIRE Unit Fire Plan) with Local, State, Federal, and Tribal entities, as appropriate.
- S-3.5 Require all new development to comply with fire safety standards identified in Chapter 15.16 of the Willits Municipal Code
- S-3.6 Identify key metrics and recommendations from the Little Lake Fire Protection District to ensure adequate service is provided to residents and businesses.
- S-3.7 Locate new critical facilities outside of the very high fire hazard severity zone unless no alternate location is available or feasible.

- S-3.8 Require all new development and major redevelopment/reconstruction within the high and very high wildfire hazard severity zones to prepare a Fire Protection Plan.
- S-3.9 Consider the relationship between existing and future development on the current and future demands for Fire and Emergency Services facilities and personnel.
- S-3.10 Coordinate vegetation management activities with Cal FIRE, LLFPD, and users of the railway, including the Skunk Train and ensure fire risk is reduced within the railroad right of way.
- S-3.11 Identify and establish fire breaks in key locations (prioritizing the City's airport and water treatment plant) that preserve and protect critical infrastructure and reduce wildfire vulnerability for the City

The proposed Project is an update to the City of Land Use Element and not a specific development project. The above discussion highlights policies within the Land Use Element and Draft Safety Element that would address potential current conditions of concern identified in category 1-6. Emergency access and evacuation would be evaluated on a case-by-case basis by the City of Willits and the Little Lake FPD and as necessary conditions of approval would be imposed to ensure access and evacuation are adequate for each project. Projects would be evaluated for their need for wildfire fuel breaks along roads or open space areas by the Little Lake FPD and would not remove identified evacuation routes, frustrate emergency response plans, and would be required to meet Little Lake FPD fire flow requirements.

However, as noted previously, the Draft Safety Element has not been adopted. In addition, modifications to the Draft Safety Element may be required to assure consistency with applicable state legislation that has been passed since the draft's preparation in 2019. SB 99 for instance, focuses on identifying residential developments in hazard zones lacking at least two emergency evacuation routes and the associated revisions of the general plan, and the safety element in particular, to address limited emergency evacuation access and/or ingress, although the Land Use Element contains Policy LU-9.7, Emergency Evacuation, prohibits subdivisions in neighborhoods having only one access.

The Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential wildfire impacts without the adoption of Mitigation Measure GEO-01. In addition, further mitigation would be required to ensure that the Safety Element is consistent with applicable state legislation that has been passed since the draft's preparation in 2019. The adoption of the mitigation measures below would reduce wildfire hazards associated with the adoption of the proposed Land Use Element Update to less than significant levels.

Mitigation Measure

Mitigation Measure GEO-1 defined in Section 4.7 Geology and Soils Impact GEO-1 would be applied to ensure that wildfire hazard policies of the Draft Safety Element would apply within the City.

WF-01. Prior to adoption of the Draft Safety Element, review, an update shall be required to is consistent with applicable state legislation that has been passed since the draft's preparation in 2019.

Significance After Mitigation

Impacts would be less than significant with mitigation.

Impact WF-05b: The Land Use Element has a neutral impact on existing Wildfire Risk Reduction Measures. Updating and adopting the City's 2019 Draft Safety Element would lessen impacts relating to Categories 1-6, and potential wildfire evacuation impacts from the Land Use Implementation would be less than significant.

IMPACT WF-05B

Responses to questions in category 7 are not intended to be considered alone. The guidance checklist, as applied to a single discrete Project, would consider numerous positive responses to questions in category 7, in combination with limited positive responses in topic areas 1-6, could lead to a less than significant impact conclusion. As noted earlier, as this is a programmatic project being reviewed, a simple yes or no answer is not always applicable.

Numerous positive responses to questions in categories 1-6 indicate the Project could have a significant impact on wildfire evacuation risks. However, the discussion of categories 1-6 in regard to future conditions under proposed Land Use Element policies and implementation programs intended to reduce City's risk of wildfire for each category is included in the discussion session below category 6.

Category 7. Consideration of Project Wildfire Risk Reduction Measures

Would the project meet all California Fire Safe Regulations (Public Resources Code Section 4290) for new streets and buildings?

- California Fire Safe Regulations are not applicable within the City of Wililts or LRA. However, the Little Lake FPD follows State Fire regulations in SRA and the Little Lake FPD and the City of Willits together apply Chapter 15.16 of the Willits Municipal Code, California Fire Code, which includes all appendices and National Fire Codes, and is comparable to State fire safe regulations.

Does the project have multiple emergency routes?

- The City of Willits has two primary evacuation routes, Highway 101 and State Route 20. Projects allowed by the Land Use Element Update would be reviewed by the Little Lake FPD and the City of Willits to ensure that they meet Fire Code requirements relating to evacuation. New developments would also be required to be consistent with Policy LU-9.6, Emergency Evacuation, which requires new subdivisions to have at least two access routes, unless otherwise allowed by the Little Lake FPD.

Would the project provide new firefighting facilities or staffing?

- New development is required to pay an impact fee to the Little Lake to fund a proportionate share of public facilities, fire equipment, and fire apparatus to maintain the Little Lake FPD's level of service and community safety.

Would the project provide wildfire fuel breaks along roads or open space areas?

- CAL FIRE and the Mendocino County Fire Safe Council (MCFSC), of which Little Lake FPD is an active member, have worked together to perform a series of road clearing/fuel break creation projects aimed at corridors on which ingress and egress may be particularly critical in a wildfire situation. This practice would be further supported by adoption of the City's Draft Safety Element would include policy S-3.11 which seeks to identify and establish fire breaks in key locations that preserve and protect critical infrastructure and reduce wildfire vulnerability for the City. Program

1 in the Draft Safety Element supports these efforts as well by designating staff or volunteers for the removal of dead vegetation from roadways and drainage in fire-prone areas, along with the construction of additional fire breaks.

Would the project provide early detection and/or enhanced notification systems?

- Adoption of the Draft Safety Element would provide an early warning communication system for enhanced notification through policy S-5.4.

Does the project have sufficient on-site water sources for firefighting?

- The City's water system contains 298 fire hydrants. The City water distribution system includes approximately 28 miles of transmission and distribution lines of various sizes, six (6) treated water storage tanks, three (3) pump stations, and 240 fire hydrants (Communications with City Staff 2023). There are also six (6) water storage tanks that provide for a total of 4.72 MG of water storage located throughout the City water system service area. Outside of the grid, water for fire protection y is provided by one 4000-gallon water tender, one 2000-gallon tactical water tender, each with portable water tanks, on-board tanks on each engine, and other available water supplies sources such as ponds, creeks, swimming pools, and cisterns from which the Little Lake FPD can draft water. Development under the Land Use Element Update would include the extension of City of Wililts services, including water for fire protection.

Have first responders indicated in writing that they have significant resources to manage evacuation traffic, such that strategies like contraflow are feasible?

- The Mendocino 2020 Fire Vulnerability Assessment incorporates input from first responders to determine fire vulnerabilities for Willits and the region. This Assessment interviewed the fire service company and chief officers who were on duty and actively engaged for one or more of the major wildfires events in the region during 2017 and 2018. These interviews showed that staff learned several lessons from the Redwood Complex Fire that enabled them to adequately staff and manage evacuations during the Mendocino Complex Fire, which is currently the third largest wildfire in California history.

Does the project or jurisdiction provide emergency evacuation buses and pickup sites through the school district or through public transportation?

- MTA and The Willits Unified School District operate buses that have been identified as emergency evacuation assets. Operational agreements in case of emergency have not been established yet but this was identified in the Mendocino 2020 Fire Vulnerability as a recommendation. As the 2019 City of Willits Draft Safety Element has not yet been adopted, there is an opportunity to address this issue or incorporate this as a proposed policy.

Discussion:

For the most part, the Land Use Element does not impact or incorporate the City's Wildfire Risk Reduction Measures. The proposed Land Use Element contains a series of policies and implementation programs that support the City's Wildfire Risk Reduction Measures in category 7. Relevant policies and implementations are listed below.

Goal LU-1 which seeks logical and appropriate annexations that maintain a compact City boundary as well as surrounding open space, working lands and natural resources and support disadvantaged

communities and Goal LU-7 seek to consider the needs of all communities in City decision making. In addition, Goal LU-8 is to ensure that land use decisions protect and sustain important natural resources and limit exposure to hazards, in particular LU-9.6, Emergency Evacuation. These policies would lessen potential impacts related to wildfire risk and wildfire evacuation.

The Attorney General's Evacuation Interim Guidance are especially useful for identifying potential wildfire hazard impacts of site-specific projects, but do not contain specific criteria for identifying specific impacts of a programmatic endeavor, such as a Land Use Element Update. The Land Use Element does address a critical issue identified by SB 99 through Policy LU-9.6 Emergency Evacuation, which prohibits subdivisions having only one access in hazard zones. The interim guidance has also highlighted the importance of the adopting the Draft Safety Element prior to or following the adoption of the Land Use Element. Policy S-5.4 of the 2019 Draft of the Safety Element, for instance, would directly address the issue of early warning/enhanced notification by directing the City to establish an early warning communication system for enhanced notification. Policy S-3.11, as well, directs the establishment of fire breaks in key locations that preserve and protect critical infrastructure and reduce wildfire vulnerability for the City. Program 1 of the Draft Safety Element further supports these efforts by designating staff or volunteers for these efforts. However, the 2019 Draft does not address state legislation passed after the draft was completed. State guidance in AB 747, AB 1409, and SB 99 were all passed after 2019.

The Draft Safety Element (2019) is not yet adopted and cannot yet be relied upon to lessen potential wildfire impacts without the adoption of Mitigation Measure GEO-01. In addition, further modifications would be required to ensure that the Safety Element is consistent with applicable state legislation that has been passed since the draft's preparation in 2019. The adoption of the mitigation measures below would reduce wildfire hazards associated with the adoption of the proposed Land Use Element Update to less than significant levels.

Mitigation Measure

Mitigation Measure GEO-1 defined in Section 4.7 Geology and Soils Impact GEO-1 would be applied to ensure that wildfire hazard policies of the Draft Safety Element would apply within the City.

WF-01. Prior to adoption of the Draft Safety Element, review, an update shall be required to is consistent with applicable state legislation that has been passed since the draft's preparation in 2019.

Significance After Mitigation

Impacts would be less than significant with mitigation.

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4.0 ALTERNATIVES

4.1 PURPOSE AND METHODOLOGY

The purpose of an alternatives analysis in an EIR, per §15126.6(a) of the State CEQA Guidelines, is to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." In addition, the State CEQA Guidelines specifies that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly" (Guidelines §15126.6(b)).

4.2 DEVELOPMENT OF THE ALTERNATIVES

An EIR must describe a range of reasonable alternatives to the Proposed Project that could feasibly attain most of the basic objectives of the project. The feasibility of an alternative may be determined based on a variety of factors, including but not limited to economic viability, availability of infrastructure, and other plans or regulatory limitations (Guidelines §15126.6(f)(1)). As discussed in Section 3, Project Description, the objectives of the Land Use Element Amendment are as follows:

1. Plan for a range of potential population growth levels within the City.
2. Facilitate infill development and commercial vitality.
3. Define an expanded Sphere of Influence that includes appropriate areas around the City for potential future residential development to help ensure an adequate City supply of developable land.
4. Ensure adequate public utilities, services, infrastructure, and a street network that supports all users and plan for phased improvements to support existing, and new land planned for residential and commercial development.
5. Plan new and sustain existing parks and recreation facilities for the entire community, especially underserved areas.
6. Facilitate the vitality of Downtown and South Main Street by improving important City gateways and by defining flexible land use regulations to encourage adaptive re-use of existing structures and design standards that improve the streetscape and create a comfortable atmosphere for walking, biking, outdoor seating and gathering.
7. Define a Land Use Map and policy that minimizes the number of non-conforming uses and protects existing communities from incompatible uses, reduces energy consumption, and vehicle miles travelled.
8. Streamline the permitting process and maximize opportunities for housing development to address the local, regional and statewide housing shortage, especially infill development within current city limits.
9. Protect and conserve natural resources and avoid hazards.

This analysis presents two alternatives, including the CEQA-required "no project" alternative, which involve changes to the project that may reduce the project-related environmental impacts identified in this EIR. These Alternatives have been developed to provide a reasonable range of options that would help decision-makers and the public understand the general implications of revising or eliminating certain components of the Proposed Project. The following alternatives are evaluated in this EIR:

Alternative 1: No Expanded Sphere of Influence

Alternative 2: No Project

4.3 No Expanded Sphere of Influence

The No Expanded Sphere of Influence (Alternative 1) would not increase the City Sphere of Influence and would not apply the City's Land Use Designations within these areas or allow future annexation and extensions of City services or infrastructure. The No Expanded Sphere of Influence Alternative would include proposed land use changes within the City and new policies, such as applying a special mixed use land designation to Downtown, changing vacant industrial and commercial lands to medium-density residential, and applying land use and zoning overlays to better protect riparian areas. Because Alternative 1 would not allow for expansion of the City SOI, the City's potential supply of land available for development within the City, in particular for residential development, would not be expanded beyond the land use changes within the City.

Alternative 1 would not achieve one of the project objectives which is to help ensure an adequate City supply of developable land for potential future residential development. As described in the Project Description, the City and the local business community have identified the lack of available housing as being directly related to lack of population growth and has indicated a need to hire more workers and feel that the lack of new housing is the primary issue limiting recruitment efforts. The City General Plan Land Use Designations alone cannot determine the preferences of individual property owners or their desired timing to develop their land. The City's intent is to plan additional land for residential development, increasing the available supply of residential lands, to increase the likelihood that interested developers can find willing landowners to provide new housing units to accommodate growth. Not including additional land within the SOI could result in the City lacking the necessary land capacity to match appropriate planned land intended to accommodate growth with interested developers. Alternative 1 would provide reduced housing options within the City and as a result, population growth would need to be accommodated within the unincorporated area surrounding the City at significantly lower densities and using on-site water and wastewater.

Non-residential development within the City would be the same as the Proposed Project, but would be less than the No Project Alternative, because vacant commercial and industrial land would be redesignated for residential uses. Alternative 1 and the No Project Alternative would not include the potential for the intensification of industrial and commercial areas that are served by City water that area located within the expanded SOI west of the City boundary. Land uses within these areas could not be intensified with City services because they are not within the City and may require more land for on-site wastewater treatment.

Aesthetics

Development under the No Expanded Sphere of Influence Alternative would have the same land use pattern within the current City of Willits as the Proposed Project and contain the same policy protections for potential aesthetic impacts. Impacts to scenic vistas under this alternative would likely be less compared to the Proposed Project, as this alternative would allow less development under County land

use within open areas along Locust Street and West State Route 20. Impacts within the City to light and glare under the No Expanded Sphere of Influence Alternative would similar because both Alternatives implement new performance standards in the Zoning Regulations to provide buffers, landscaping, and screening that minimize noise, light, glare, and other impacts. Both the No Expanded Sphere of Influence Alternative and the Proposed Project would have less than significant impacts on aesthetics; however, the No Expanded Sphere of Influence Alternative would have less impact because it would result in less development, which could mean less development in open areas and hillside areas in the proposed SOI areas.

AGRICULTURAL AND FORESTRY RESOURCES

Impacts to Timber Production Zones or forest lands, Department of Conservation mapped Prime Farmland, land under Williamson Act contract, or regarding the conversion of agricultural land to non-agricultural use would be the same as the Proposed Project because such lands are not present in the Planning Area. Under the No Expanded Sphere of Influence Alternative open land within larger parcels that may contain grazing would continue to be planned for five-acre rural residential or small suburban residential development. Because densities would be lower, more rural residential land in the unincorporated area may be required to accommodate growth at lower densities using on-site water and wastewater systems. The potential for conversion would likely be less than the Proposed Project, which, upon annexation, allows more residential development and would plan for the expansion of services and infrastructure and would therefore increase the likelihood that these lands may be converted to non-agricultural uses. However, ministerial development of the SOI areas under the No Expanded Sphere of Influence Alternative could occur without consideration of its impact on agricultural uses, whereas the approval of the SOI and subsequent annexation by LAFCo under the Proposed Project would require the identification of any “prime agricultural land,” as defined by Government Code 56064, during annexation planning and protected or appropriate mitigations incorporated to compensate for the conversion of such lands, per Mitigation Measure AG-01 (Proposed New Policy: Annexation Planning). As a result, impacts to agricultural lands would less under the No Expanded Sphere of Influence Alternative, but impacts to agricultural lands would likely still occur.

AIR QUALITY

New development allowed by the No Expanded Sphere of Influence Alternative, like the Proposed Project, may emit criteria pollutants, but would be required to comply with the MCAQMD’s Attainment Plan (2005) and rules and regulations and obtain applicable MCAQMD permits. Future development under both the Proposed Project and No Expanded Sphere of Influence Alternatives would be required to comply with the MCAQMD’s rules and regulations (2011) and Attainment Plan (2005).and would be expected to be consistent with reducing PM10 emissions. Within the City, the No Expanded Sphere of Influence Alternative includes performance standards regarding objectionable odors, the same as the Proposed Project. Both the No Expanded Sphere of Influence Alternative and the Proposed Project would have similar less than significant air quality impacts.

BIOLOGICAL RESOURCES

As described in Section 3.4, Biological Resources, potential habitat suitable for special-status species occurs in streams, grasslands, riparian woodland, and forests within the Project Area. Potential impacts to biological resources of the No Expanded Sphere of Influence Alternative would be the same as the Proposed Project within the City. The No Expanded Sphere of Influence Alternative would not expand the SOI, but the additional resource protection related Policies and Implementations specified in GOAL LU-8 (Protect Natural Resources within Areas Planned for Development) intended to protect and sustain important natural resources, including riparian habitat and wildlife corridors as part of ministerial

development approvals in SOI Areas. Similar to the Proposed Project, mitigation may be applied to individual projects that require CEQA review. However, the No Expanded Sphere of Influence Alternative may result in fewer units which also result in greater land consumption per unit using on-site water and wastewater systems in areas surrounding the City because there will be a smaller supply of residential land within the urbanized City to accommodate population growth. Future development within SOI areas under the No Expanded Sphere of Influence Alternative may have a lower likelihood of impacting potential habitat suitable for special-status species occurs in streams, grasslands, riparian woodland, and forests, compared to the Proposed Project because the No Expanded Sphere of Influence Alternative allows for lower density development. However, discretionary and ministerial development within SOI areas under the Proposed Project would be subject to new protective Land Use Element policy and extensive mitigations measure that expand Land Use Element Policy, and which together reduce potential impacts to biological resources within the SOI areas. As a result, in spite of the fact that development may occur in the SOI areas at lower density under the No Expanded Sphere of Influence Alternative, potential impacts to biological resources may be similar to the Proposed Project due to the policies and mitigation measures described above.

CULTURAL AND TRIBAL CULTURAL RESOURCES

The No Expanded Sphere of Influence Alternative, like the Proposed Project would have the potential to impact historic and archaeological resources through the construction of individual projects. The potential impacts to cultural and tribal cultural resources of the No Expanded Sphere of Influence Alternative would be the same as the Proposed Project within the City. Under the No Expanded Sphere of Influence Alternative, less residential and nonresidential development than under the Proposed Project would occur within the SOI Areas because these areas would not be planned for higher density development; however, individual projects would have the potential to impact historic and archaeological resources. Like the Proposed Project which includes Mitigation Measure CUL-1 (Cultural Resource Discover Protocols) and TCR-1 (Avoid Impacts to Tribal Cultural Resources), the No Expanded Sphere of Influence Alternative would continue to be subject to County Resource Management Element inadvertent discovery protocols, which are both intended to preserve and protect historic and archaeological resources in the SOI areas. Like the Proposed Project, the No Expanded SOI Alternative would be expected to result in a less than significant impact to cultural and Tribal Cultural resources within the City and SOI area.

ENERGY

Development within the City of Willits under the No Expanded Sphere of Influence Alternative would have the same land use pattern as the Proposed Project. However, because this Alternative does not include the proposed land uses in the expanded SOI and extension of city services, lower density development using would likely occur using on-site water and wastewater system that affects greater land to accommodate projected population growth. To the extent that the existing land use designations and land use pattern in the proposed SOI area under the No Expanded Sphere of Influence Alternative cannot accommodated projected population growth, new development may be more dispersed within and outside the Planning Area resulting in greater electrical transmission inefficiencies and fuel consumption. The No Expanded Sphere of Influence Alternative and the Proposed Project would have less than significant impacts, but the No Expanded Sphere of Influence Alternative may have greater impacts due to the loss of electricity serving the new development spread across a larger area that is further from the substation compared to the Proposed Project.

GEOLOGY AND SOILS

Like the Proposed Project, the No Expanded Sphere of Influence Alternative may place structures in areas with seismic sensitivity, in particular ground shaking, or erosion and loss of topsoil. There is likely little difference in the potential impacts between the Proposed Project and the No Expanded Sphere of Influence Alternative, given that geologic hazard, as reflected by the fault zones, are aligned from southeast to northwest through the City and do not include the proposed SOI Areas. The Proposed Project would rely upon the policies of programs of the Draft Safety Element and incorporates a mitigation measure (GEO-1: Adopt Draft Safety Element) to ensure that the Safety Element is in effect prior to or within six months after the Land Use Element Amendment is adopted and the No Expanded Sphere of Influence Alternative would also require Draft Safety Element adoption, therefore potential geology and soils impacts would be similar for both alternatives.

GREENHOUSE GAS EMISSIONS

Like the Proposed Project, the No Expanded Sphere of Influence Alternative will result in development that would generate GHG emissions, either directly or indirectly, that would have a significant environmental impact. The Proposed Project and No Expanded Sphere of Influence Alternative are intended to stimulate higher density residential and commercial development within the existing city boundary. The impact analysis determined that It is not feasible at this time to incorporate mitigation programs to reduce GHG emissions to less than significant levels. Therefore, this impact is considered significant and unavoidable and incorporated a mitigation (GHG-1 Revise Policy LU-3.9 Plan for Climate Change) to require the preparation of a climate action plan to address GHG emissions consistent with state targets under both Alternatives. However, the No Expanded Sphere of Influence Alternative may indirectly result in similar or greater GHG impact by allowing lower density development within a larger footprint on land outside the City to accommodate population growth if the land supply within the city does not match the demand for land to accommodate population growth.

HAZARDS AND HAZARDOUS MATERIALS

Like the Proposed Project the No Expanded Sphere of Influence Alternative could result in impacts related to the release of hazardous materials into the environment or allow development that could emit hazardous emissions. The nature of the differing land use pattern or proposed land use policy between the Proposed Project and the No Expanded Sphere of Influence Alternative will likely have little influence on this condition. The Proposed Project and No Expanded Sphere of Influence Alternative would rely upon the policies of programs of the Draft Safety Element and incorporates a mitigation measure (GEO-1: Adopt Draft Safety Element) to ensure that the Safety Element is in effect prior to or within six months after the Land Use Element Amendment is adopted, therefore potential hazards and hazardous materials impacts would be similar for both alternatives.

HYDROLOGY AND WATER QUALITY

Like the Proposed Project, development associated with population growth for the No Expanded Sphere of Influence Alternative could result in impacts related to decreases groundwater supplies or altering existing drainage patterns, or exceeding the capacity of stormwater drainage systems that would result in excessive sediment loading or reduce flood flow capacity locally and downstream in flood channels and impair water quality. The analysis of impacts for both the Proposed Project and the No Expanded Sphere of Influence Alternative substantially relies upon existing state and federal laws, the City of Willits Municipal Code, but also identifies the definitive criteria of the proposed Land Use Element policy relating to riparian buffers to lessen impacts. Impacts associated with both alternatives would be similar and be less than significant.

LAND USE AND PLANNING

Like the Proposed Project, the No Expanded Sphere of Influence Alternative does not have land uses or policies, such as a new roadway, which would divide an existing community or conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and would therefore have less than significant impacts.

MINERAL RESOURCES

Like the Proposed Project, the No Expanded Sphere of Influence Alternative does not have land uses or policies that would result in the loss of availability of a known mineral resource, or a locally important mineral resource recovery site delineated on a local general plan and would therefore have less than significant impacts.

NOISE

The City of Willits Noise Element and Zoning Regulations, plus the proposed Land Use Element land use compatibility policy serve to limit potential noise related impacts associated with the Proposed Project and No Expanded Sphere of Influence Alternative. Noise related impacts associated with both alternatives would be less than significant.

POPULATION AND HOUSING

Development under the No Expanded Sphere of Influence Alternative would be the same as the Proposed Project but could result in lower density development using on-site water and wastewater system affecting greater land outside the City and within the Planning Area to accommodate population growth. Like the Proposed Project, the No Expanded Sphere of Influence Alternative would not displace people or housing units. Impacts for the Proposed Project and the No Expanded Sphere of Influence Alternative would be similar and would be less than significant.

PUBLIC SERVICES

Development under the Proposed Project and No Expanded Sphere of Influence Alternative would accommodate population growth, which would result in an increase to emergency calls in the area, as well as an increase in additional demand for schools, parks, libraries, recreational facilities, or other public services. For the Proposed Project and No Expanded Sphere of Influence Alternative, any new or physically altered governmental facilities to accommodating growth will be subject to compliance with existing and proposed General Plan policies, Zoning Regulations, and building codes and be required undergo additional CEQA review. No such facilities are planned at this time. The City General Plan and CEQA require that potential significant environmental effects be identified and that feasible mitigation measures be included as conditions of project approval and effectively implemented and maintained over the long term. Consequently, with the implementation of existing General Plan and proposed new Land Use Element policy, substantial adverse physical impacts associated with the provision of new or physically altered facilities triggered by the Land Use Element would be less than significant for the Proposed Project and No Expanded Sphere of Influence Alternative.

RECREATION

Population growth that would occur under the Proposed Project and No Expanded Sphere of Influence Alternative would increase the use of existing parks and recreational facilities and the need for new parks to maintain existing General Plan service ratios. Implementation of the policies and programs contained in the existing General Plan Public Services and Facilities, Parks and Recreation Element and the Land Use Element Amendment would ensure that needed new facilities are provided and reduce the potential for the deterioration of existing parks and recreation facilities. The City General Plan and CEQA require that potential significant environmental effects be identified and that feasible mitigation measures be

included as conditions of project approval and effectively implemented and maintained over the long term. The implementation of the existing and proposed new General Plan policy, impacts relating to the need for new or expanded parks and recreation facilities triggered by development within the city would be less than significant. However, if substantial development occurs outside the City under the No Expanded Sphere of Influence Alternative, City General Plan policy would not apply and may not be able to ensure that new needed facilities are provided or that deterioration of existing parks and recreation facilities can be limited. Therefore, potential impacts to City parks and recreation facilities from the No Expanded Sphere of Influence Alternative would likely be greater than the Proposed Project.

TRANSPORTATION AND CIRCULATION

The Proposed Project and No Expanded Sphere of Influence Alternative would not include policy that would disrupt existing, or interfere with planned, bicycle and pedestrian facilities or transit service or include modifications to the transportation network that would be inconsistent with the applicable design standards. The Proposed Project and No Expanded Sphere of Influence Alternative are intended to create more opportunity sites for expected growth in closer proximity to employment opportunities in the commercial areas within the City. If the No Expanded Sphere of Influence Alternative allows more population growth in outlying unincorporated areas, potential VMT impacts of the No Expanded Sphere of Influence Alternative would be greater than the Proposed Project.

UTILITIES AND SERVICE SYSTEMS

The No Expanded Sphere of Influence Alternative would accommodate growth like the Proposed Project and create additional demand for water, wastewater, electricity, natural gas, telecommunication, and stormwater drainage facilities. Any utility expansion within City limits would be subject to existing and proposed General Plan policies regarding service capacity and service extension and be required to undergo additional CEQA review. No such facilities are planned at this time. The General Plan and CEQA require that potential significant environmental effects be identified and that feasible mitigation measures be included as conditions of project approval and effectively implemented and maintained over the long term. Impacts involving utility expansion within the City under No Expanded Sphere of Influence Alternative would be less than significant, same as the Proposed Project. Utilities and service systems impacts of growth under the No Expanded Sphere of Influence Alternative that is outside the City Willits would be subject to County policy and discretionary approval.

WILDFIRE

The No Expanded Sphere of Influence Alternative could impair an adopted emergency response plan or emergency evacuation plan exacerbate wildfire risks. The Proposed Project and No Expanded Sphere of Influence Alternative would rely upon the policies of programs of the Draft Safety Element and incorporates a mitigation measure to ensure that the Safety Element is in effect prior to or within six months after the Land Use Element Amendment is adopted and both include. Land Use Element Update includes a policy LU-9.7, Emergency Evacuation, which prohibits subdivisions in neighborhoods having only one access or that are vulnerable to isolation if access roads are impacted, until alternative evacuation routes are established or where the Fire Marshal has determined that access and egress are adequate. Potential wildfire hazards within the City would be similar for both alternatives.

4.4 NO PROJECT ALTERNATIVE

CEQA requires that the alternatives discussion include an analysis of a “No Project” Alternative. Pursuant to CEQA, CEQA Guidelines (Section 15126.6[e][2]) the No Project Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community

services. The No Project Alternative typically will proceed along one of two lines: (1) when a project is a revision of an existing regulatory plan or policy, the No Project Alternative will be continuation of the existing plan or policy; or (2) if a project is a development project on identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. In this case, the No Project Alternative represents the continuation of existing General Plan Land Use Designations and Land Use Element policy within the City and existing Sphere of Influence and population growth is expected to be accommodated under those existing designations is assumed to occur under this alternative.

The No Project Alternative assumes there is no change in General Plan Land Use Designations or Land Use Policy and no expansion to the City Sphere of Influence. The No Project Alternative would accommodate growth within existing City Land Use Designations, in contrast to the Proposed Project. It is assumed that the No Project Alternative would accommodate that same level of population growth to a total planning period population of 7,500. However, the No Project Alternative would not accomplish project objectives to the extent that the Proposed Project would, as the No Project Alternative would provide reduced housing options within the City and would not include proposed Land Use Element policies relating to Downtown and South Main Street community and business enhancement, mixed use development, or the protection of natural resources, and sustainability. As a result, the No Project Alternative would utilize land within the City is a less efficient manner and population growth would need to be accommodated within the unincorporated area surrounding the City within the Planning Area at significantly lower densities and using on-site water and wastewater.

The No Project Alternative could potentially accommodate more non-residential development within the City because vacant commercial and industrial land would be redesignated for residential uses. The No Project Alternative would not include the potential for the intensification of industrial and commercial areas that are served by City water west of the City boundary located within the expanded SOI. Land uses within these areas could not be intensified with City services because they are not within the City and may require more land for on-site wastewater treatment.

AESTHETICS

Development under the No Project Alternative would continue the land use pattern that currently exists in the City of Willits and not expand the existing SOI. Impacts to scenic vistas would be limited within the City when compared to the Proposed Project because hills slopes within the City are not identified as scenic vistas from public vantage points. This alternative would not change land uses or expand the SOI into the hillslopes along S.R. 20 or Locust Street within the unincorporated area and these areas could be developed into smaller and large lot rural residential developments on hillsides based on the current County land use designation and zone, but such development would be encouraged to cluster. The Proposed Project would be subject to a mitigation measure incorporating a new policy that requires new development in hillside areas be sited and designed to retain the natural hillside setting by minimizing grading and other major disruptions of the natural slope areas and to encourage clustered dwelling units to preserve the scenic character of the hillsides. Impacts to light and glare under the No Project Alternative would be more significant, given that the Proposed Project would implement new performance standards in the Zoning Regulations to provide buffers, landscaping, and screening that minimize noise, light, glare, and other impacts. The Proposed Project would have less than significant impact on aesthetics; however, the Proposed Project may allow more development in hillside areas in the proposed SOI areas. The No Project Alternative would not include protections relating to light and glare.

AGRICULTURAL AND FORESTRY RESOURCES

Impacts to Timber Production Zones or forest lands, Department of Conservation mapped Prime Farmland, land under Williamson Act contract, or regarding the conversion of agricultural land to non-

agricultural use would be the same as the Proposed Project because such lands are not present in the Planning Area. Under the No Project Alternative open land within larger parcels that may contain grazing would continue to be planned for five-acre rural residential or small suburban residential development. Because densities would be lower, more rural residential land in the unincorporated area may be required to accommodate growth at lower densities using on-site water and wastewater systems. The potential for conversion would likely be less than the Proposed Project, which, upon annexation, allows more residential development and would plan for the expansion of services and infrastructure and would therefore increase the likelihood that these lands may be converted to non-agricultural uses. However, ministerial development of the SOI areas under the No Project Alternative could occur without consideration of its impact on agricultural uses, whereas the approval of the SOI and subsequent annexation by LAFCo under the Proposed Project would require the identification of any "prime agricultural land," as defined by Government Code 56064, during annexation planning and protected or appropriate mitigations incorporated to compensate for the conversion of such lands, per Mitigation Measure AG-01 (Proposed New Policy: Annexation Planning). As a result, impacts to agricultural lands would less under the No Project Alternative, but impacts to agricultural lands would likely still occur.

AIR QUALITY

New development allowed by the No Project Alternative, like the Proposed Project, may emit criteria pollutants, but would be required to comply with the MCAQMD's Attainment Plan (2005) and rules and regulations and obtain applicable MCAQMD permits. Future development under both the Proposed Project and No Project Alternatives would also be required to comply with the MCAQMD's rules and regulations (2011) and Attainment Plan (2005).and would be expected to be consistent with reducing PM10 emissions. Regarding objectionable odors, the Proposed Project includes new Land Use Element policies to ensure that new development and land uses are compatible with surrounding uses, which are not present in the No Project Alternative. Both the No Project Alternative and the Proposed Project would have less than significant air quality impacts; however, the No Project Alternative would not include policies to ensure that new development and land uses are compatible with surrounding uses.

BIOLOGICAL RESOURCES

As described in Section 3.4, Biological Resources, potential habitat suitable for special-status species occurs in streams, grasslands, riparian woodland, and forests and elsewhere within the Planning Area. The No Project Alternative would not expand the SOI when compared to the Proposed Project; however, the No Project Alternative would not include the additional protections afforded by new policy in the Protect Natural Resources within Areas Planned for Development policy grouping and as a result may potentially impact special status species or their habitat, including riparian habitat and wildlife corridors. Similar to the Proposed Project, mitigation may be applied to individual projects that require CEQA review to prepare a biological resources assessment, conduct pre-construction bird-surveys, roosting bird surveys, and apply bird-safe design. The No Project Alternative may have greater impacts within riparian areas, compared to the Proposed Project because the No Project Alterative would not include the Proposed Project's specific natural resource protection policies that apply to ministerial and discretionary development. In addition, in order to accommodate population growth, the No Project Alternative may involve lower density development within unincorporated land using on-site water and wastewater systems surrounding the City within the Planning Area.

CULTURAL RESOURCES

The No Project Alternative, like the Proposed Project, would have the potential to impact historic and archaeological resources through development of individual projects. The No Project Alternative would not expand the City SOI and may result in indirect impact associated with development to accommodate

population growth occurring at lower densities within the Planning Area and result in potentially significant impacts to historic and archaeological resources. However, similar to the Proposed Project, mitigation may be applied to individual projects that require CEQA review to require a historic and archaeological resources study.

Impacts to Tribal cultural resources are highly dependent on the individual project site and the level of ground disturbance. Under the No Project Alternative, the SOI would not be expanded. Like the Proposed Project, development facilitated under the No Project Alternative may involve excavation, which could potentially impact previously unidentified Tribal cultural resources. The No Project Alternative would not include new Land Use Element policies designed to preserve and protect Tribal cultural resources; however, similar to the Proposed Project, mitigation may be applied to individual projects that require CEQA review to avoid Tribal cultural resources and follow protocols in the case of an unanticipated discovery. Overall because the SOI would not be expanded under the No Project Alternative, the severity of impacts would be slightly less than the Proposed Project.

ENERGY

Development under the No Project Alternative would continue the land use pattern that currently exists in the City of Willits and may result in lower density development using on-site water and wastewater system affecting greater land outside the City and within the Planning Area to accommodate population growth. New development under the Project is expected to occur closer to the substation than under current conditions because the proposed Land Use Element and Sphere of Influence changes create more opportunities for new development closer to the substation compared to existing conditions. In this way the Project minimizes the loss of electricity serving the new development in the Planning Area resulting in a beneficial impact on electrical energy use as well as to lower gasoline and diesel energy use are possible due to support infill and mixed-use growth and improved active transportation conditions.

GEOLOGY AND SOILS

Like the Proposed Project, the No Project Alternative may place structures in areas with seismic sensitivity, in particular ground shaking, or erosion and loss of topsoil. There is likely little difference in the potential impacts between the Proposed Project the No Project Alternative, given that geologic hazards are primarily located within the existing City boundary. The Proposed Project would rely upon the policies of programs of the Draft Safety Element and incorporates a mitigation measure to ensure that the Safety Element is in effect prior to or within six months after the Land Use Element Amendment is adopted. The No Project Alternative would also require Draft Safety Element adoption, therefore potential geology and soils impacts would be similar for both alternatives.

GREENHOUSE GAS EMISSIONS

Like the Proposed Project, the No Project Alternative will result in development that would generate GHG emissions, either directly or indirectly, and that would have a significant environmental impact. The Proposed Project is intended to stimulate higher density residential and commercial development within the city, and the proposed Sphere of Influence changes are intended to facilitate future annexation of adjacent areas into the city with commensurate increases in the allowed density and intensity of land uses in these areas. This analysis determined that ensuring that the Project's GHG emissions will be mitigated through programs reducing emissions is not feasible at this time. Therefore, GHG emissions is considered a significant and unavoidable impact and incorporated a mitigation requiring the preparation of a climate action plan to address GHG emissions. Development under the No Project Alternative would continue the land use pattern that currently exists in the City of Willits and may result in lower density

development affecting greater land outside the City and within the Planning Area to accommodate population growth and as a result may have greater GHG impacts.

HAZARDS AND HAZARDOUS MATERIALS

Like the Proposed Project the No Project Alternative could result in impacts related to the release of hazardous materials into the environment or allow development that could emit hazardous emissions. The nature of the differing land use pattern or proposed land use policy between the Proposed Project and the No Project Alternative will likely have little influence on this condition. The Proposed Project would rely upon the policies of programs of the Draft Safety Element and incorporates a mitigation measure to ensure that the Safety Element is in effect prior to or within six months after the Land Use Element Amendment is adopted. The No Project Alternative would also require Draft Safety Element adoption, therefore potential hazards and hazardous materials impacts would be similar for both alternatives.

HYDROLOGY AND WATER QUALITY

Like the Proposed Project, development associated with population growth could result in substantial decreases groundwater supplies or to alter existing drainage patterns, or exceed the capacity of stormwater drainage systems that would result in excessive sediment loading or reduce flood flow capacity locally and downstream in flood channels and impair water quality. The analysis of impacts for the Proposed Project substantially relies upon existing state and federal laws, the City of Willits Municipal Code, but also identifies the definitive criteria of the proposed Land Use Element policy relating to riparian buffers to lessen impacts. Although impacts associated with both alternatives would be less than significant, the No Project Alternative does not have prescriptive standards for the protection of riparian areas and would likely result in greater impacts.

LAND USE AND PLANNING

Like the Proposed Project, the No Project does not have land uses or policies, such as a new highway, which would divide an existing community or conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

MINERAL RESOURCES

Like the Proposed Project, the No Project does not have land uses or policies that would result in the loss of availability of a known mineral resource, or a locally important mineral resource recovery site delineated on a local general plan.

NOISE

Development under the No Project Alternative would continue the land use pattern that currently exists in the City of Willits and may result in lower density development affecting greater land outside the City and within the Planning Area to accommodate population growth. The City of Willits Noise Element and Zoning Regulations serve to limit potential noise related impacts associated with the Proposed Project, which are also applicable to the No Project Alternative. However, the Proposed Project contains a series of policies that are intended to achieve compatibility between adjacent uses and to add performance standards to the Zoning Regulations for industrial and heavy commercial development adjacent to residential areas to provide buffers, landscaping, and screening that minimize noise. Although noise related impacts associated with both alternatives would be less than significant, the No Project Alternative does not add performance standards to the Zoning Regulations that minimize noise and would likely result in greater impacts.

POPULATION AND HOUSING

Development under the No Project Alternative would continue the land use pattern that currently exists in the City of Willits and may result in lower density development using on-site water and wastewater system affecting greater land outside the City and within the Planning Area to accommodate population growth. Like the Proposed Project, the existing General Plan was developed to accommodate expected growth and provide for orderly development and growth. Development consistent with the existing General Plan and proposed Land Use Element update would not displace people or housing units. Impacts for the Proposed Project and the No Project Alternative would be similar and would be less than significant.

PUBLIC SERVICES

Development under the Proposed Project and No Project Alternative would accommodate population growth, which would result in an increase to emergency calls in the area, as well as an increase in additional demand for schools, parks, libraries, recreational facilities, or other public services. Both the current General Plan and proposed Land Use Element update rely on existing Public Services and Facilities, Parks and Recreation Element policies that are intended to ensure that development occurs in a manner which is consistent with the ability of local public agencies to provide adequate services and facilities. The Proposed Project and No Project Alternative would both be expected to result in a less than significant impact on public services.

RECREATION

Population growth that would occur under the Proposed Project and No Project Alternative would increase the use of existing parks and recreational facilities and the need for new parks to maintain existing General Plan service ratios. However, the nature and location of potential new or expanded park and recreation facilities needed to ensure that existing park facilities do not deteriorate or to maintain City park service ratios is not known. In the event that new or expanded facilities are required as part of a subdivision or other permit pursuant to the City General Plan, Subdivision and Zoning Regulations, the City would address environmental impacts through project specific CEQA review. If the development of new or expanded park and recreation facilities is initiated by the City, the City's action to carry out the project would require General Plan conformance review pursuant to Government Code Section 65402 and be subject to project-specific CEQA review. The City General Plan and CEQA require that potential significant environmental effects be identified and that feasible mitigation measures be included as conditions of project approval and effectively implemented and maintained over the long term. Consequently, impacts relating to parks facilities would be similar for the No Project Alternative and the Proposed Project would be less than significant; however, the proposed new Land Use Element Update policy relating to strategic park planning would further lessen the potential for recreation related environmental impacts.

TRANSPORTATION AND CIRCULATION

The Proposed Project with new mixed-use land use designations is intended to create more opportunity sites for expected growth in closer proximity to employment opportunities in the commercial areas of the City. Population and employment growth would be expected to generate VMT per capita at rates similar to baseline conditions. However, the Proposed Project would be expected to general even lower VMT rates are possible due to the Proposed Project's policy changes that support infill and mixed-use growth plus improved active transportation conditions.

UTILITIES AND SERVICE SYSTEMS

The Proposed Project and No Project Alternative are intended to accommodate population growth during the planning period and encourage growth to occur where infrastructure either already exists or doesn't exceed the capacity of existing infrastructure. Where population growth would exceed the capacity of existing under either the Proposed Project or No Project Alternative, site-specific CEQA analysis would be required prior to the implementation of improvements necessary to support such development. Overall, impacts from population growth relating to water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities from the Proposed Project and No Project Alternative would be comparable and less than significant.

WILDFIRE

Like the Proposed Project the No Project Alternative could impair an adopted emergency response plan or emergency evacuation plan exacerbate wildfire risks. The Proposed Project would rely upon the policies of programs of the Draft Safety Element and incorporates a mitigation measure to ensure that the Safety Element is in effect prior to or within six months after the Land Use Element Amendment is adopted. The No Project Alternative would also require Draft Safety Element adoption. The Land Use Element Update includes a policy LU-9.7, Emergency Evacuation, which prohibits subdivisions in neighborhoods having only one access or that are vulnerable to isolation if access roads are impacted, until alternative evacuation routes are established or where the Fire Marshal has determined that access and egress are adequate. Potential wildfire hazards would be generally similar for both alternatives, less than significant with mitigation, however Policy LU-9.7, Emergency Evacuation, would further reduce impacts for the Proposed Project.

4.5 ALTERNATIVES CONSIDERED BUT REJECTED

The following summarizes alternatives considered, but ultimately rejected for inclusion in the analysis as they would not meet most of the project objectives, would not substantially reduce impacts compared to the Proposed Project, or were determined to be infeasible.

The City considered an alternative that would only consider including the Locust Street area within the Proposed Sphere of Influence. This alternative was originally considered to meet all project objectives and was considered to be environmentally superior, in comparison to the Proposed Project, because it would not involve any additional Sphere of Influence areas. However, early on within the planning process it was learned that Locust Street is a dead-end road and a costly secondary access, which could include a new bridge across Baechtel Creek, would be required for to allow more than 30 new residential units in this this area. In addition, a preliminary windshield review of potential indicated that wetlands may be present within the areas thought best to accommodate new development. As a result, this alternative was rejected.

4.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that EIRs identify the Environmentally Superior Alternative and discuss the facts that support that selection. The Lead Agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives and/or is infeasible. If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives.

Of the other alternatives evaluated in this, the No Expanded Sphere of Influence Alternative would be the environmentally superior alternative. The although impacts would be less than the Proposed Project, the No Expanded Sphere of Influence Alternative would potentially result in lower direct levels of aesthetic

impacts due to less City development within undeveloped hill slopes, and less potential impacts to agricultural and forestry resources, biological resources, cultural resources, energy, greenhouse gas emissions, VMT and wildfire hazards because the project would not involve expansions of the City Sphere of Influence where the likely of direct potential impact would be greater. It should be noted though, that the Proposed Project prioritizes infill development and would limit expansion of new development into Sphere areas according to the needs to expand the supply of residential land because there is a mismatch between the willingness of landowners to develop within the City and the demand for residential land. Indirect impacts may occur if large lot rural residential development using on-site water and wastewater systems occurs in areas within the Planning Area and outside the City.

Pursuant to CEQA requirements, the No Expanded Sphere of Influence Alternative would be considered the environmentally superior alternative; however, the Proposed Project would offer benefits that would not be achieved by the No Expanded Sphere of Influence Alternative, primarily expanded housing opportunities matching demand for residential development.

Comparison of Direct Impact of Alternatives			
	Proposed Project	**No Expanded Sphere of Influence**	**No Project**
Aesthetics	Less than Significant	**<=**	**>**
Agricultural and Forestry Resources	Less than Significant with Mitigation Incorporated	**<=**	**>=**
Air Quality	Less than Significant	**=**	**>=**
Biological Resources	Less than Significant with Mitigation Incorporated	**<=**	**>=**
Cultural Resources	Less than Significant	**<=**	**>=**
Energy	Less than Significant	**<=**	**>=**
Geology and Soils	Less than Significant with Mitigation Incorporated	**=**	**=**
Greenhouse Gas Emissions	Significant and Unavoidable	**<=**	**<**
Hazards and Hazardous Materials	Less than Significant with Mitigation Incorporated	**=**	**=**
Hydrology and Water Quality	Less than Significant	**=**	**>=**
Land Use and Planning	Less than Significant	**=**	**=**
Mineral Resources	Less than Significant	**=**	**=**
Noise	Less than Significant	**=**	**>=**
Population and Housing	Less than Significant	**=**	**=**
Public Services	Less than Significant	**=**	**=**
Recreation	Less than Significant	**>=**	**>=**
Transportation Circulation	Less than Significant	**<=**	**>=**

Comparison of Direct Impact of Alternatives			
	Proposed Project	**No Expanded Sphere of Influence**	**No Project**
Utilities and Service Systems	Less than Significant	**=**	**=**
Wildfire	Less than Significant with Mitigation Incorporated	**<=**	**>=**

5.0 OTHER CEQA SECTIONS

5.1 CUMULATIVE IMPACTS

The California Environmental Quality Act (CEQA) defines cumulative impacts as "two or more individual actions that, when considered together, are considerable or will compound other environmental impacts." Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis allows an EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

Because the project is a comprehensive update to the General Plan Land Use Element, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. CEQA Guidelines Section 15130(b)(1)(B) gives direction for cumulative impact analysis and allows provides that an adequate discussion of environmental impacts can occur through:

> A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, which describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

By its nature a comprehensive update to the General Plan Land Use Element which defines land uses considers cumulative by considering development that could occur to accommodate projected growth within the City. For example, the transportation analysis considers the overall change in vehicle miles travelled (VMT) due to land use changes within the City and the expanded Sphere of Influence. Therefore, the analysis in this PEIR considers the cumulative impacts in the City due to implementing the Land Use Element Update. These cumulative effects are accounted for in the analysis of air quality, energy, greenhouse gas emissions, and noise impacts; therefore, these analyses would also be considered cumulative.

Other impacts, such as geology, soils and cultural resources, are site specific and would not result in an overall cumulative impact from growth outside of the City. Therefore, the analysis of project impacts in this PEIR also constitutes the cumulative analysis.

5.2 GROWTH INDUCING IMPACTS

CEQA requires an EIR to describe any growth-inducing impacts that would result from the proposed action. This section first describes the types of actions that tend to induce growth, and then discusses those impacts as they generally relate to the proposed action. The section then addresses four specific actions that potentially lead, directly or indirectly, to more growth, namely: (1) fostering economic or population growth; (2) removing existing obstacles to growth; (3) other precedent-setting actions; and (4) developing or encroaching upon existing open space.

> §15126.2(e) The Growth-Inducing Impact of the Proposed Project. Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional

> housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Based on Section 15126.2(e), a general plan would considered growth-inducing if it would: directly or indirectly foster economic growth, population growth, or the construction of additional housing; if it would remove obstacles to population growth; if it would draw down the capacity of community service facilities to the extent that construction of new facilities would be necessary; or if it would encourage or facilitate other activities that cause significant environmental effects. For example, expanding road capacity or sewer and water facilities is typically considered “growth inducing” because such projects generally alleviate existing problems and/or inefficiencies, as well as provide capacity for some additional growth.

State law requires the general plan to serve as a comprehensive, long-term plan for the physical development of a community, for which the Land Use Element plays a central role. The Land Use Element Update does not propose any specific development projects, so it will not directly involve any growth inducing impacts. However, indirect growth-inducing impacts would occur because the proposed land use changes and their locations, including the proposed expansion of the Sphere of Influence, along with the proposed goals, policies, and implementation measures of the City General Plan, in particular the propose changes associated with the Land Use Element Update will provide a framework for future growth and development within the City of Willits. The environmental impacts that could result from potential growth are analyzed in detail in Chapter 3 of this PEIR.

FOSTER ECONOMIC OR POPULATION GROWTH

As described in the detail in the project description, future population growth within the City is uncertain and may reflect projected countywide growth by the State of California, which projects little or no growth within the County during the Planning Period. Because there are no strong indicators of demographic or economic change in the City of Willits and the Countywide projection would suggest that City population would remain steady, the City of Willits has determined that continuing to use population growth projection from the 1992 General Plan, 7,500 persons, as the total City population at the end of the 20-year planning period, or 2043, was determined to be the conservative approach. The Land Use Element assumes that the City population will grow by approximately 2,600 people occupying up to 1,500 new housing units, depending upon the future ratio of person per household. In addition, the proposed Land Use Element Update designates vacant land to accommodate future residential, industrial, commercial, and public facility related uses.

Land uses and future development consistent with the Land Use Element Update would result in additional housing; commercial, industrial, and agriculture-related land uses; and the development of public services and infrastructure within the City of Willits. The proposed Land Use Element Update would accommodate growth within the City, first encourage growth in infill areas that have additional land and service capacity and then expanding the City through annexations to accommodate land use demand.

The proposed Land Use Element Update would indirectly facilitate construction-related employment. Construction workers would likely come from throughout the county to work within the City. Over time, new employees would likely be hired, and businesses would indirectly create additional demand for

goods and services and directly or indirectly facilitate business growth. This could increase the incomes of existing and new residents of the City, which would also increase demand for goods and services, leading to additional growth.

The potential increase in population and economic activity allowed by the proposed Land Use Element Update could be considered growth inducing. However, the State of California Department of Housing and Community Development identifies regional housing needs for county and the City is required to plan for such growth. In addition, the State Department of Finance released population projections for California counties in July 2023 (State of California, Department of Finance, Population Projections for California and Its Counties 2020-2060, Sacramento, California, March 2024). These new projections indicate that the population of Mendocino County in the year 2043 will be roughly similar to the current county population.

The objectives of the Land Use Element Update are to plan for a range of potential population growth levels within the City and facilitate infill development and commercial vitality, while also defining an expanded Sphere of Influence that includes appropriate areas around the City for potential future residential development to help ensure an adequate City supply of developable land and ensure adequate services and infrastructure. It also seeks to define a Land Use Map and policy that minimizes the number of non-conforming uses and protects existing communities from incompatible uses, reduces energy consumption, and vehicle miles travelled and protects and conserve natural resources and avoid hazards. In addition, due to the availability of developable areas within the City and proposed Sphere of Influence expansion area, any economic expansion induced by the project is not anticipated to result in direct physical environmental effects beyond those described throughout Chapter 4, Environmental Analysis.

REMOVE OBSTACLES TO GROWTH

Growth may result from the removal of physical and regulatory obstacles that have in the past limited growth. Obstacles or impediments to growth can include the lack of infrastructure, lack of public services, or land use planning constraints such as restrictive General Plan policies or Zoning regulations.

New residential and commercial development allowed by the proposed Land Use Element Update would result in construction of new streets to provide adequate access. Infrastructure improvements will also be necessary to support the new development. These improvements would likely be sized to also accommodate additional growth in adjacent areas of the City that would be served by such facilities.

While substantial portions of the City are largely developed and contain adequate site-serving infrastructure, some infrastructure would have to be upgraded or expanded to accommodate infill development. In this sense, the proposed General Plan Update would induce growth by encouraging development of new infrastructure to support an orderly development pattern.

The proposed Land Use Element Update also includes a proposed expansion of the City Sphere of Influence to include additional land for residential and employment-related development. The Land Use Element also includes a framework for monitoring the City land supply in relation to actual growth and encouraging annexations of land adjacent to the City that support the preservation of open space lands, orderly development, result in the efficient use of City services and utilities; and support a transportation network that minimizes vehicle trips. The proposed expansion of Sphere of Influence would be required to be consistent with the policies of and receive approval from the Mendocino Local Agency Formation Commission, which prioritize the protection of open space land and agricultural land, as would any future application for annexation.

PRECEDENT-SETTING ACTIONS

Actions that are associated with the proposed Land Use Element Update that could be considered precedent setting include changes in General Plan Land Use Designations and the expansion of the City Sphere of Influence Area.

By adding land to the Sphere of Influence or changing land use designations of properties from suburban residential to Residential-Medium Density, for instance, the Land Use Element Update may be setting a precedent for future development of vacant land. Expanding urban areas could facilitate the future projects, such as subdivisions and residential housing developments. The existing General Plan and Land Use Element Update and this PEIR contain policies, implementation programs, and mitigations to reduce the environmental impacts of future growth. Similar policies, implementation programs and environmental documents will be needed to offset impacts of future public facilities, plans, and discretionary projects that follow.

DEVELOPMENT OF OR ENCROACHMENT UPON OPEN SPACE

The Land Use Map and new proposed Land Use Element Update policies were developed to avoid areas containing natural resources such as wetlands and riparian areas. Rather than encroach upon open space, the proposed Land Use Element Update expands protections for such areas. Any future uses developed within the proposed Sphere of Influence would require annexation to the City of Willits in compliance with procedures identified by the Mendocino County Local Agency Formation Commission including protections for open space and agricultural lands.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines §15126.2-Consideration and Discussion of Significant Environmental Impacts, requires EIRs to describe any significant irreversible environmental changes that would result from the proposed action (implementation of the proposed Land Use Element Update). Decision-makers must consider the benefits of a proposed project against the irretrievable commitments of resources in determining whether to approve a project. The CEQA Guidelines describe the scope of this analysis as follows:

> 15126.2(d) Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Implementation of the proposed Land Use Element Update would allow development that would result in long-term irretrievable commitments of nonrenewable resources associated with the construction of new housing units, non-residential structures, streets, and other infrastructure. The commitment of natural resources would include lumber and forest products, sand and gravel, asphalt, petrochemicals, and other construction materials. The resulting consumption of fossil fuels would incrementally reduce existing supplies of fuel oil, natural gas, and gasoline. Consumption of these resources would occur with any development in the region and are not unique to the City of Willits or the Land Use Element Update.

An incremental increase in energy demand would also take place during construction and postconstruction activities, including lighting, plumbing, and heating of commercial, industrial, school, and

residential buildings. The Land Use Element Update includes policies to encourage energy conservation and reduction and the use of renewable energy systems. However; even renewable energy systems involve the use of fossil fuels and minerals in their manufacture, although these systems are designed to result in considerably less demand for fossil fuels during their lifecycle than technologies powered by fossil fuel combustion.

The development and further urbanization within the City would effectively result in irreversible environmental changes; once an area is developed into a built environment, the likelihood of 'reversing' developed areas back to an undeveloped state is highly improbable because the investment of resources and infrastructure for new development is an asset that tends to be protected over time. Therefore, such changes are considered irreversible. From a larger geographic perspective, attracting growth to the City of Willits, where infill development is prioritized and the footprint of the City would be allowed to expand to accommodate growth thereafter, instead of allowing growth in outlying unincorporated areas of the county could reduce the scale of irreversible environmental effects.

6.0 REPORT PREPARERS

6.1 LEAD AGENCY

City of Willits

Community Development Director ..... Dusty Duley
City Planner (prior) ..... Taylor Perry

6.2 LIST OF PREPARERS

Planwest Partners, Inc.

Principal Planner/Partner ..... Colette Sanche, AICP
Project Manager ..... John Miller
Associate Planner ..... Sarah Atkins
GIS Analyst ..... Jason Barnes
Senior Planner ..... Krystle Heaney, AICP
Senior Advisor ..... Michael Richardson

LACO Associates

Becky Clark ..... Senior Planner, AICP
Mike Nelson ..... President, Principal Planner, AICP
Meghan Ryan ..... Planning Director
Byron Turner ..... Deputy Planning Director
Amy Marigo ..... Assistant Planner
Max Hilken ..... Associate Planner
Christopher Alberts ..... Associate Planner

J.B. Lovelace & Associates

Principal Environmental Scientist ..... J. Brett Lovelacer

Fehr & Peers

Forecasting Practice Leader ..... Ronald Milam, AICP, PTP